

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CASE NO.: 1:17-cv-2989-AT

DONNA CURLING, et al.,
Plaintiffs,

vs.

BRAD RAFFENSPERGER, et
al.,

Defendants.

VIDEOCONFERENCE

VIDEOTAPED

DEPOSITION OF: DOUG LOGAN

DATE: FRIDAY, NOVEMBER 18, 2022

TIME: 9:02 A.M. - 3:54 P.M.

PLACE: VIA VIDEOCONFERENCING TECHNOLOGY

STENOGRAPHICALLY

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S T I P U L A T I O N S

It is hereby stipulated and agreed by and between
the counsel for the respective parties and the deponent
that the reading and signing of the deposition
transcript be reserved.

P R O C E E D I N G S

(Whereupon, the proceedings began at 9:02 a.m.)

THE VIDEOGRAPHER: Good morning, everybody.

We're going on the record at 9:02 a.m. Eastern Standard Time, on Friday, November 18th, 2022.

Please note that this deposition is being conducted virtually. Quality of recording depends on quality of camera and internet connection of participants. What is seen from the witness and heard on screen is what will be recorded. Audio and video recording will continue to take place unless all parties agree to go off the record.

This begins Media Unit 1 of the video recorded deposition of Doug Logan, taken in the matter of Donna Curling v. Raffensperger.

This deposition is being conducted remotely via Zoom. My name is Duke Stephenson; I'm the videographer. And the court reporter today is Jazzmin Musrati. We both represent Veritext.

Will counsel please introduce themselves, after which will the court reporter please swear in the witness.

MR. BROWN: Bruce Brown for the plaintiffs.

MR. JIHADI: Wail Jihadi for the Curling

1 plaintiffs.

2 MS. LaROSS: Diane LaRoss for the State
3 defendants.

4 MR. JACOUTOT: Bryan Jacoutot for the State
5 defendants.

6 MS. HERNANDEZ: Danielle Hernandez for the
7 State defendants.

8 MR. PICO-PRATS: Javier Pico-Prats for the
9 State defendants.

10 MS. EDMONDSON: Anna Edmondson for the State
11 defendants.

12 MR. JACOUTOT: We're also joined by Bryan Tyson
13 for the State defendants.

14 MR. LOWMAN: And this is David Lowman for the
15 Fulton County defendants.

16 THE STENOGRAPHER: Raise your right hand,
17 please.

18 Do you swear or affirm the testimony you are
19 about to give will be the truth, the whole truth, and
20 nothing but the truth?

21 THE WITNESS: Yes, ma'am.

22 Thereupon,

23 DOUG LOGAN,
24 having been first duly sworn or affirmed, was examined
25 and testified as follows:

DIRECT EXAMINATION

BY MR. BROWN:

Q. Please state your name for the record.

A. Douglas Logan.

Q. Mr. Logan, first, thank you for appearing today.

I first need to ask you a formal question. Are you under any medication or any drugs that would have any impact upon your ability to testify truthfully today?

A. No, sir.

Q. You have had the flu? Are you feeling -- had a cold. Are you feeling okay?

A. I'm feeling all right today. Not 100 percent yet, but it's okay.

Q. Okay. Well, if you need a break, or counsel, if anybody else needs a break, just so indicate, and that's fine. Typically I will take a break about every hour anyway, just so everybody can stretch and regroup. But if you need a break, that's fine.

Particularly, since we're on Zoom, it's easy to talk over each other and difficult for the court reporter to straighten out the testimony.

So I will do my best not to interrupt you, and if you could do the same for me.

If there are any questions that I have that are

1 not clear, just let me know and I will reframe it the
2 best I can.

3 Mr. Logan, I'm going to ask just a couple of
4 general questions about your background. Where did you
5 go to college?

6 A. Milford College.

7 Q. And what was your degree?

8 A. So I have a double major in business management
9 and accounting with minors in computers and technology
10 and peace and conflict studies.

11 Q. And do you have any post graduate degrees?

12 A. No, sir.

13 Q. In the last ten years, just tell me very
14 generally your employment or business history.

15 A. So for the vast majority of the last ten years, I
16 ran my own company called Cyber Ninjas, and for a few
17 years before that to cover ten years, I was in the same
18 field. So I am doing application security.

19 Q. Did you say -- I just didn't hear you --
20 application security?

21 A. Application security.

22 Q. And what does that mean?

23 A. So it's an area of cybersecurity that focuses on
24 making sure that application development is secure. So
25 I work with developers in order to help ensure that

1 the -- the applications are properly made to be secure.

2 Q. Are you -- are you still working with Cyber
3 Ninjas?

4 A. No. Cyber Ninjas went out of business 1st of
5 January of this year.

6 Q. And what -- what is your work now?

7 A. I am unemployed.

8 Q. And did Cyber Ninjas file for bankruptcy?

9 A. No, sir.

10 Q. Okay.

11 A. Based on consultations with attorneys, there was
12 no value. Bankruptcy does not actually resolve debts
13 for corporations anyway, so...

14 Q. Okay. I need to ask you another just formal
15 question.

16 You don't have any electronic devices that you're
17 messaging with other people right now, are you?

18 A. No, sir.

19 Q. Okay. Thank you.

20 Mr. Logan, when did you first get involved in
21 election analysis using voting system data?

22 A. It was after the 2020 election.

23 Q. When did you begin seeking access to Georgia
24 voting systems after the 2020 election?

25 A. So November 14th, I was introduced to someone who

1 was on the way to Lin Wood's house to help with Election
2 Integrity efforts. And around that time period that I
3 met with them and talking to the counsel there, there
4 was an interest in getting forensic images of systems in
5 order to support litigation.

6 Q. Was that litigation to -- relating to the 2020
7 election?

8 A. Yes, sir.

9 Q. Was the purpose to see if the election might be
10 reversed?

11 A. The purpose was to discover exactly what had gone
12 on, because there was a number of statistical anomalies
13 that happened in the election.

14 Q. What kind of statistical anomalies?

15 A. My background is not -- not specifically in that
16 type of math. But I have been told by a number of
17 people who are that there was a number of different
18 standard tests that do -- that they do over elections,
19 that this last election failed.

20 I think one of them is called the BeneSys
21 analysis or something like that. But there's -- I mean,
22 elections are one of the most well studied areas of
23 statistics across the globe because of interest in
24 ensuring democracy. And some of this analysis showed
25 that there was -- there was potential problems in this

1 election.

2 Q. The -- you said you were introduced to someone,
3 and then you mentioned Lin Wood. Could you describe
4 that, who it was that you got involved with Lin Wood's
5 group?

6 A. So I had a friend of mine who asked me if they
7 figured out who was working on the election stuff, if I
8 would be willing to take a look into it. I said yes.
9 So she introduced me to somebody, who introduced me to
10 Jim Penrose, who was on his way to Lin Wood's house, and
11 he called me up, and I went with him and went there.

12 Q. Did you know Jim Penrose before?

13 A. No, sir.

14 Q. And who is Jim Penrose? Who does he work for?
15 What does he do?

16 A. I do not know who he currently works for. His
17 background is with the NSA. I believe he was the
18 individual who originally set up the counterintelligence
19 unit at the NSA.

20 Q. And what -- what was his work at the time that
21 you met him?

22 A. He worked for some contractor. I don't -- I
23 don't remember the details. I'm sorry.

24 Q. Do you know who he was paid by, directly or
25 indirectly?

1 A. I don't remember. If you said the name, I might
2 recognize it, but I don't remember.

3 Q. And so he called you and said what, generally?

4 A. Something along the lines of, hey, we're going to
5 work on this, I am going to Lin Wood's house, if you
6 want to come with us. So I packed up a bag, and I went.

7 Q. When was that? You mentioned the day
8 November 14th before.

9 A. Yeah. That's the day I left was November 14th.

10 Q. And do you mind giving me the name of your friend
11 who referred you to Jim Penrose?

12 A. I do mind.

13 Q. I might have to come back to that, but we'll move
14 on for now.

15 The -- when you got to Lin Wood's -- it's called,
16 what, Tomotley Plantation; is that right?

17 A. Correct.

18 Q. Who else was there?

19 A. I don't know if I remember exactly who was there
20 at the time when I got there. There -- I mean, there
21 was -- of course, Lin Wood was there.

22 Q. Penrose?

23 A. Penrose -- Penrose was there. There was some guy
24 from the CIA. I don't know if I'd even remember his
25 name if you said it. He was a published author of some

1 sort. Specifically I think he did a lot of work in
2 Venezuela, as I recall it. There is a guy who has some
3 product association with Ali Alexander. I am not
4 remembering his name. That may be enough for you to
5 remember. Not -- not long afterwards, Sidney Powell
6 came for a short period of time before coming back at a
7 later date for a longer period of time.

8 I -- I might be forgetting somebody. This is two
9 years ago. Trying to remember all of these details is
10 kind of hard.

11 Q. Do you remember, was Mike Flynn there?

12 A. He was not there when I went there initially. He
13 did eventually come.

14 Q. Did he -- did he come while you were there?

15 A. Yes.

16 Q. And how long was he there?

17 A. I don't -- I don't think I would be accurate if I
18 give you any number.

19 Q. How long were you there?

20 A. Besides a few trips, you know, I was there pretty
21 much from November 14th until Christmas Eve.

22 Q. Was Patrick Byrne there?

23 A. He stopped by I think for a few days, if I
24 remember correctly. But, no, he was not generally
25 there.

1 Q. How about Scott Hall?

2 A. No.

3 Q. How about Jesse Binnall, he's an --

4 A. No.

5 Q. -- attorney?

6 Dave Bossie?

7 A. Don't even know who he is.

8 Q. Okay. How about Russ Ramsland?

9 A. He was not there.

10 Q. Could you just describe for me, generally,
11 what -- what you were doing while you were at the
12 Tomotley Plantation?

13 A. So it was a number of different things. I think
14 most of this really is not very relevant for anything
15 that you're doing. But there was a lot of sorting
16 through information that was being given by grassroots
17 movements across the country and connecting people who
18 were working on similar things so that they could have
19 effectiveness. I also in general helped out with a lot
20 of IT related stuff. He had a system administrator who
21 had recently left, and there was a lot of stuff that
22 needed to be maintained associated with that.

23 Q. And then what work did you do on things that you
24 think are relevant to this?

25 A. I mean, besides potentially phone calls and stuff

1 in Georgia, that's -- that's about -- that's about it.
2 But none of the work that we did at that point in time
3 resulted in any forensic images.

4 So, I mean, I think what -- let's step that back
5 a little bit. When Matt DePerno got the order from the
6 court in order to be able to get forensic images there,
7 somehow he reached out and connected, and we had already
8 found a forensic company to potentially do that when the
9 time -- you know, when something was there. So Sidney
10 Powell was able to assist with that.

11 Q. So for the record, who is Matt DePerno?

12 A. Matt DePerno is an attorney out of Michigan who
13 was the primary counsel on the Antrim, Michigan case.

14 Q. And is it your testimony that at some point he
15 informed the group that he had obtained what?

16 A. I was not involved in those conversations. But
17 what I can tell you is that in preparation for
18 potentially being able to capture forensic images to
19 support litigation, I had reached out to a number of
20 people in the industry, and Jim Penrose had done the
21 same, and everyone had recommended SullivanStrickler as
22 a highly reputable firm who would be capable to do it
23 the proper way so it was legally admissible. And so
24 that had already been established. I don't know if they
25 already had a contract or not.

1 But when they -- when Matt DePerno got
2 permission -- got the court to be able to collect the
3 forensics images, they were able to send someone to do
4 that collection because they had that relationship
5 established. I don't know exactly what happened behind
6 the scenes. Quite frankly, most of those discussions
7 happened with Jim Penrose and others; it was not
8 directly with me.

9 Q. Was it your understanding that Sidney Powell or
10 her organization was funding the work of
11 SullivanStrickler for Mr. DePerno?

12 A. Correct. That's my understanding. The Defending
13 the Republic's goal was to -- to fund operations like
14 that across the country for whatever needed to be done
15 for the legal thing. So as far as I know, she had no
16 involvement in the case in Antrim, Michigan. But she
17 assisted in that manner to -- to help with the
18 timeliness, to help with what was happening.

19 Q. And then before we get to Georgia, was anything
20 done with respect to Arizona when you were at Tomotley?

21 A. Nothing was done in Arizona. Well, I mean, we
22 got reports from patriots across the country, going
23 through information related to that stuff. But, no,
24 nothing really directly with that.

25 But, again, I would say what is -- what is the

1 relevance to how could that potentially be relevant to
2 your case?

3 Q. Yeah. The -- in terms of what is discoverable,
4 Mr. Logan, it's not just what's strictly relevant. It's
5 what might lead to the discovery of admissible evidence.
6 I'm not going to go off on a tangent because we don't
7 have enough time. But I do appreciate your comment.

8 With -- specifically with respect to Georgia,
9 what was discussed, if you recall, about Georgia when
10 you were at Tomotley?

11 A. I'm sorry, that's too vague to answer. Can you
12 be more specific, please?

13 Q. Well, you mentioned Michigan, right, with
14 Mr. DePerno? Did I say that right?

15 A. Uh-huh.

16 Q. And that you learned, directly or indirectly,
17 that he had a court order and that SullivanStrickler was
18 engaged to assist with the Michigan work, right?

19 A. (No audible response.)

20 Q. You need --

21 A. Yes.

22 Q. -- to say yes.

23 I saw you nodding your head, but the court
24 reporter has to take down your words. Sorry.

25 When did any attention, if ever, turn to the

1 state of Georgia with respect to its election or its
2 election systems?

3 A. So there was a lot of conversations with
4 individuals in Georgia. And there was one point --
5 there was one point in time where SullivanStrickler, I
6 don't remember the county or whatever, but they actually
7 called SullivanStrickler and was deployed to a location.
8 And Jim and I actually went to that location to check it
9 out. And in the conversations, it was pretty -- pretty
10 evident that no one with the proper authority was there.
11 And so canceled and pulled it off, because everything we
12 wanted to be legally admissible. And if there -- you
13 can't -- if you don't have someone engaged who has the
14 appropriate legal authority to do anything.

15 And I believe that cut -- that call was actually
16 made from -- from one of the attorneys. And I -- you
17 would have to talk to Jim as to exactly who it was.
18 They called up and said, hey, this is what is going on.
19 And they're like, no, that's not going to work.

20 Q. Okay. And you said you were deployed. Did you
21 actually go or you're thinking about going?

22 A. We actually drove from -- from South Carolina to
23 somewhere in Georgia.

24 Q. Where did you go in Georgia?

25 A. I don't remember.

1 Q. Do you remember how long it took you to get there
2 from Tomotley?

3 A. It was -- it was a long drive, but it was
4 something we did in a day. I want to say it was three
5 or four hours, but that's -- honestly, that's probably
6 speculation.

7 Q. Sure.

8 Was it Ware County?

9 A. I really don't know. I'm -- you -- if you want
10 accurate results of where it is, I'm sure that
11 SullivanStrickler billed for it, and I'm sure they
12 turned in documents on that. It shouldn't be hard for
13 you to figure that out. I'm not trying to be evasive, I
14 just don't know.

15 Q. I understand.

16 So who all went to this other location in
17 Georgia?

18 A. So Jim and I did. And when I was out there, and
19 I don't -- I don't know how they were involved or
20 whatever, but Todd Sanders and Conan --

21 Q. Hayes?

22 A. -- Hayes.

23 Q. Yeah.

24 A. They were there. That's the first time I ever
25 met them. They were out there. And there was a

1 whole -- like, when we went out there to meet with them,
2 we ended up -- ended up at someone's house that was
3 having some sort of party or some sort. I don't know
4 why. So there was a lot of other people there, but
5 they -- I don't think they're relevant to you. And I
6 couldn't name them if you wanted me to, so...

7 Q. So it was -- it was you and Mr. Penrose, Todd
8 Sanders, Conan Hayes.

9 And were people from SullivanStrickler there
10 also?

11 A. Yes.

12 Q. And who was it, Paul Maggio?

13 A. I really don't remember well enough to tell you.
14 There were definitely two or three people there from
15 SullivanStrickler, but I couldn't tell you who. I'm
16 sorry.

17 Q. Was it Freemyer? Do you remember, was he there?

18 A. I mean, I talked with -- with Greg Freemyer a lot
19 of times. It's possible, but I really don't remember.
20 And I can't tell you if I don't remember.

21 Q. I understand.

22 And so you all collect in this place in Georgia.
23 And then did you meet with local officials?

24 A. There were some local people there, but I think
25 the conclusion was that they weren't in whatever

1 authority. I think I was only there for, like, 20,
2 30 minutes and then we drove back. Like, it was not --
3 it was a no, this is not going to work, and we left.
4 So...

5 Q. Were the local people associated with elections
6 at all, or just sort of --

7 A. They -- they -- they were, if I recall correctly.
8 But I don't remember how much in periphery -- I mean,
9 honestly, I didn't have a lot of those conversations.
10 You would really need to talk to Jim.

11 Q. So -- but the sense that you got is Jim and the
12 others checked it out and it was -- this isn't going to
13 work, right?

14 A. Yeah. It wasn't going to work. I mean, the
15 whole goal was to get things for -- for a potential
16 legal action, it had to be obtained legally, or you
17 can't use it, you know, in a lawsuit. And so if -- it
18 we went someplace and there was not the appropriate
19 authority, then you don't -- you don't proceed, you
20 know.

21 Q. And so then you packed up and -- or didn't even
22 need to unpack. So you probably didn't pack back up.
23 But you went back up to Tomotley; is that right?

24 A. Correct.

25 Q. And did you -- before going to Coffee County, did

1 you attempt to -- to do work in any other Georgia
2 county?

3 A. I don't recall anything specifically. There was
4 a lot of phone calls. Because we were spending a lot of
5 time trying to aid different patriots in what they were
6 doing across the country, there was -- I had a lot of
7 phone calls with a lot of different people at times.
8 But I don't have any recollection of anything else
9 specific in Georgia that looked like it was going to
10 materialize.

11 I think the one exception that was much later on,
12 when I was in the audit, someone connected me with
13 someone who -- in a county in Georgia, that said that
14 their election -- they had -- they had come out and they
15 found their election equipment door was wide open in a
16 public space, and they asked what we should do. And I
17 said, if I were you, I would treat it like a compromised
18 system like you do, and I would get forensic images, but
19 you need to follow up with whoever ran it.

20 And they asked me, who would you recommend for
21 that. I said, the only company I know that does that is
22 SullivanStrickler. Here is their phone number. But as
23 you can see, with everything that's happened, this stuff
24 is politically charged, and you'd probably be better off
25 going with another forensics firm, and any forensics

1 firm could do this work. And you could just capture it
2 and sit on it. If you want to do something in the
3 future, you can, and if you don't want to do something
4 in the future, you don't have to. And that's all I
5 heard about that. I don't know if anything happened.

6 Q. Do you know which county that was?

7 A. I -- I think it's actually listed in my messages.
8 And I want to say that it's -- that it's Spalding, but
9 I'm not positive. I would go off the messages. And
10 most of what I found on those messages were -- they were
11 like reading something brand new to me when I found
12 them.

13 Q. I know the feeling.

14 You mentioned Spalding County was the later
15 incident, after you went to Coffee County, when you were
16 in Arizona, correct?

17 A. Correct. And that wasn't tied with any work that
18 I was doing with anyone. Just someone said they had
19 questions, and I try to help people when they have
20 questions. It's what I do.

21 Q. Sure.

22 A. So if I can connect people, I connect people.

23 Q. Just to get back to the earlier attempt to go to
24 a -- a place in Georgia where you were not comfortable
25 with the authorizations, that wasn't Spalding, I take

1 it, right?

2 A. I -- I assume not, but I honestly don't remember.

3 Q. Okay.

4 A. Yeah, I really -- I don't know.

5 Q. Okay. So you -- you testified that you left
6 Tomotley on Christmas Eve, correct?

7 A. (No audible response.)

8 Q. You need to say -- you need to say yes. Or New
9 Year's Eve?

10 A. No. I -- I ceased being -- staying at Tomotley
11 on Christmas Eve. Correct. Yes.

12 Q. So by the time you left, had Coffee County been
13 identified as a potential location to do additional
14 work?

15 A. As far as I knew, you know, after things finished
16 at the end of -- as of December, there was no more --
17 there was not going to be any more attempts to have any
18 forensic images. You know, I was surprised by the
19 Coffee County stuff.

20 Q. And by the end of December, was that because the
21 election was finished or finished enough?

22 A. Yes, sir.

23 Q. Okay. So then how did -- how did Coffee County
24 come up in 2021, from your perspective?

25 A. So I -- I got a phone call from Jim saying that

1 they had gotten forensic images, and I was really
2 surprised. And I asked -- I asked, how? And I don't
3 remember the specific details of what was said, but he
4 told me that -- I think the wording was that, like,
5 everyone had approved of it, that the board had approved
6 of it even.

7 But I am not sure how good my memory is on that
8 right now honestly. There's a lot of things I've gotten
9 wrong when I've looked back to the facts, from messages
10 or other things in that regard.

11 Q. Sure. Particularly on dates and sequences, that
12 can happen a lot. I understand. Be careful --
13 you're -- I appreciate you being very careful about your
14 level of confidence in your recollection, and that is
15 very helpful.

16 Now, so he -- he called at some point in January
17 saying -- let me piece that apart a little bit.

18 When he called you, the data had already been
19 captured, correct?

20 A. Correct.

21 Q. And did you understand at that time that
22 SullivanStrickler had done it?

23 A. I don't know.

24 Q. And it was your understanding that contrary to
25 other attempts in Georgia, this one had been authorized;

1 is that right?

2 A. Well, it -- we -- I think that's a poor question.
3 I mean, the goal was always to have it be authorized,
4 but it was not successful because we had not gotten
5 authorization. And in this particular case, there --
6 there was authorization.

7 Q. And Mr. Penrose -- or your -- to the best of your
8 recollection, Mr. Penrose told you that it had been
9 cleared by members of the board or people of authority,
10 correct?

11 A. Correct. And I even asked who the attorney was,
12 you know, and I was told that, you know, Charles Bundren
13 was the primary attorney working on it.

14 Q. And who -- who was his client?

15 A. I -- I don't remember. I probably knew at the
16 time.

17 Q. Did you have an -- an understanding, when
18 Mr. Penrose called you, as to the purpose of capturing
19 these images, now that the election was -- had been
20 decided?

21 A. I -- I don't remember. I can tell you that after
22 the election happened, you know, our goal was to make
23 sure that the elections were secure going forward, and
24 that's always been -- at least that's always been my
25 personal goal. I can't speak for everybody.

1 And so my assumption would be that at that point
2 that that was what I was thinking about. But that's --
3 again, that's speculation, you know. I know what I
4 think about, and I know what I cared about, so I can
5 pretty safely say that, but...

6 Q. Well -- yeah, I don't -- don't take this as
7 sarcastic at all, but I just need to get you to fill it
8 in from your perspective.

9 What was the relationship between making
10 elections more secure going forward and capturing a
11 forensic copy of the election system?

12 A. A lot of the mathematical models that said there
13 was problems with things showed distinct patterns in the
14 way the results were turned in. Like literally I'm
15 thinking counties in Georgia, I think it was some of the
16 work of I think Edward Solomon and I think even Bobby
17 Piton had some stuff that showed actual literal ratios
18 on the votes that went through.

19 And so -- so those type of manipulations, if that
20 analysis was accurate, the -- the only strong way to do
21 that would be through a computer system. Otherwise, you
22 would not have such clear, fixed numbers in it. So if
23 that's true and proving whether it was true or not true
24 is important for elections.

25 I think one of the things that -- I mean, it can

1 be as destructive to democracy if no one trusts
2 elections as much as it can be if we're actually
3 insecure. And so getting to the bottom of whatever
4 theories are and proving them true or false is extremely
5 important for our country.

6 Q. You mentioned Edward Solomon. And who was the
7 other I guess statistician?

8 A. Yeah. Bobby Piton.

9 Q. And can you describe just in a little bit greater
10 detail the -- what anomaly, if that's the right word, of
11 the ratio of votes you were describing?

12 A. What you literally found was that the ratio
13 between -- between candidates were exactly a certain
14 ratio among a large number of the precincts. I'm pretty
15 sure all of that information is public.

16 Q. Right.

17 A. And just an example of the sort of things that we
18 did is, you know, I would take stuff like Edward
19 Solomon, and I'd pull another mathematician I'd be
20 talking with and say, does his stuff make sense? You
21 know, is it accurate? Is he making -- is he making
22 mistakes in this stuff? Is it solid? What is -- what
23 is the deal on that? And, you know, I would get them
24 working together to get better results and more accurate
25 results to make sure that it wasn't, you know,

1 misinformation out there.

2 Q. Sure.

3 I have a lot of -- I'm going to have other
4 questions in between, but now that we're on this topic,
5 fast forward to after the work on Coffee County had been
6 done by you and by others. Did you determine any causes
7 of that anomaly from the system?

8 A. Are you reference -- when you say "that anomaly,"
9 are you referencing specifically the -- the stuff I
10 mentioned with Edward Solomon's work?

11 Q. Yes.

12 A. No, I have -- I have not confirmed that. You
13 know, quite frankly, I haven't had a lot of time to ever
14 dive into the Coffee work. And so I have not spent
15 considerable time even looking at that.

16 Q. You said you hadn't confirmed. Were you able to
17 rebut it?

18 A. No, sir.

19 Q. When I asked you about the anomaly, you quite
20 correctly asked me to be specific about the ratios that
21 Solomon and others had identified. Were there other
22 flaws in the system that you investigated one way or the
23 other, potentially?

24 A. Specifically in Coffee County, Misty stated --
25 I'm going to -- I'm going to talk about this as

1 generically as I can, because I don't -- I don't want to
2 say specifics that are wrong. But what I was -- what
3 was relayed to me about the situation was that there was
4 a problem with the ballots, where they tried to run the
5 machine, and it would stop on candidates. And they
6 would have to -- you know, they would have to refeed it
7 if it was the ICP, or if it was the ICC device, they
8 would literally had to find the problem ballot and point
9 it out. And she stated that it was always a Republican
10 candidate.

11 And so someone had a discussion with the Dominion
12 rep that was onsite and said something to the effect of,
13 if you don't have this fixed in the next 30 minutes, you
14 know, we're going to go to press, and it's been a
15 repetitive issue for a very long time over and over
16 again.

17 The Dominion rep walked outside, got on the
18 phone, 30 minutes came -- 30 minutes later came back in
19 and said it -- try it now. And not only did it work
20 then, but they never had the issue ever again.

21 And so the question became, how is it that
22 something could -- that has been a regular problem over
23 and over again, somehow not be an issue after there's --
24 a Dominion rep goes and makes a phone call. What on
25 earth could they have done? Are they remotely accessing

1 the machines? You know, what's -- what exactly is
2 happening there?

3 Q. And were you able to determine the answer to
4 that?

5 A. No, sir.

6 Q. I'm not suggesting that this is false, but what
7 was the -- the evidence, either anecdotal or otherwise,
8 that, in fact, prior to Dominion's telephone call, that
9 Republican ballots had been rejected with greater
10 frequency while scanning?

11 A. I believe it was all anecdotal. I think it's
12 something that had been mentioned -- noticed by the
13 people doing the work. But that's -- I mean, as you've
14 seen the expert report that -- the issue from when I was
15 in Coffee County, part of what was testing was trying to
16 find a scientific way to figure out if that is, in --
17 was, in fact, accurate. And the numbers suggested it
18 was.

19 Q. The numbers from your report suggested it was?

20 A. Correct.

21 Q. We'll get to that in a second.

22 We have mentioned two things: One was the -- the
23 Edward Solomon issue; the other one was Misty Hampton's
24 observations about the rejection of the Republican
25 ballots.

1 Before I move on, which scanner was rejecting it?
2 Was it the precinct scanner or the central scanner?

3 A. I believe it was both.

4 Q. Both?

5 A. And it was the ICC device, the ImageCast Central
6 device, which was the one that magically started
7 functioning properly.

8 Q. Were you able -- ever able to determine
9 whether -- what Dominion did to make it magically start
10 working again?

11 A. I -- I was never able to determine that.

12 Q. Do you know if anybody was?

13 A. I believe Jeff has some -- some theories that
14 he's proving out some of them.

15 Q. That's Jeffrey Lenberg?

16 A. Yes, sir.

17 Q. Okay. Other than -- I'm not saying that's
18 insufficient to cause concern. But other than those two
19 types of issues, were there other things that you were
20 looking for or concerned about with respect to the
21 Coffee County data?

22 A. No, sir.

23 Q. Okay. I'm going to jump back to -- to Tomotley.
24 And this is a different track, and I am just going to go
25 through some questions about your emails.

1 A. Okay.

2 Q. When -- when you were introduced to Lin Wood, is
3 that when you started using his domain for your email?

4 A. Shortly thereafter. I'm a very -- I can be a
5 very organized person. So if I am doing work, I try to
6 keep it on something. And so Election Integrity stuff,
7 I was doing it for Lin Wood, and we kept it on an email
8 address.

9 Q. And then what happened to those emails?

10 A. I -- I don't know. I mean, I ceased having
11 access to that -- I remember sometime during the audit I
12 was trying to look at the contacts and saw I no longer
13 had access to it. And I wasn't -- so I don't know if
14 they still have them or if they destroyed them. I
15 really don't know. I just know I don't have access to
16 them.

17 Q. And that was when you were in Arizona; is that
18 right?

19 A. Correct.

20 Q. And when was that?

21 A. I couldn't tell you.

22 Q. 2021?

23 A. Yeah. I mean, but beyond that, I couldn't tell
24 you. Sometime during the audit in 2021. That whole
25 time period is a blur for me.

1 Q. What -- don't you have copies of those emails
2 somewhere?

3 A. That would be unethical.

4 Q. Well, they're from you?

5 A. You -- so if you went and worked for a company
6 doing work for them, you think it would be perfectly
7 ethical for you to maintain and keep a copy of all your
8 business records? That would be absolutely unethical.
9 No, I would not do that.

10 Q. So is that a no, you don't have copies?

11 A. No.

12 Q. Have you asked Lin -- I'm not suggesting that you
13 have to, you might -- but have you asked Lin Wood or
14 anybody associated with them whether you can have access
15 to those emails?

16 A. No. I have not talked with Lin Wood in a long
17 time.

18 Q. I take it from your answers, but I just need to
19 ask. You haven't deleted any of those emails, have you?

20 A. No.

21 Q. In addition to Coffee County and Arizona, what
22 other jurisdictions' election management server contents
23 have you seen or analyzed?

24 A. Besides Arizona and you said --

25 Q. Georgia.

1 A. -- Coffee County?

2 Q. Yeah.

3 A. I have done work in Michigan.

4 Q. And when did you do work in Michigan?

5 A. I was an expert on the Antrim, Michigan case.

6 MR. BROWN: Let me do two things. First, if I
7 could mark as Exhibit 1, Tab 1, which I think is your
8 subpoena, just to get that in the record.

9 (Whereupon, Plaintiff Exhibit 1 was marked for
10 identification.)

11 MR. BROWN: I think it's going to -- it should
12 appear on your screen.

13 THE WITNESS: I've probably got to switch
14 screens to get over to this -- Exhibit Share, is that
15 where I should see something?

16 MR. BROWN: Yes, sir. Thanks.

17 THE WITNESS: I don't see anything yet, so...

18 MR. BROWN: Okay. If we could load both 1 and
19 2. Tab 1 will be Exhibit 1; Tab 2 will be Exhibit 2.

20 (Whereupon, Plaintiff Exhibit 2 was marked for
21 identification.)

22 THE WITNESS: Is something supposed to pop up?
23 Nothing is coming up.

24 MR. BROWN: Okay. Hold on one second.

25 MS. MARKS: Jenna, are you uploading, or do you

1 want me to do that, Jenna?

2 She may be away. I will go ahead and upload.

3 A. Okay. The Tab 1, Logan subpoenas and cover
4 letter, I have now up.

5 BY MR. BROWN:

6 Q. And you -- you received a copy of that subpoena,
7 obviously?

8 A. To the best of my knowledge, if this is the
9 one -- I believe it's the one I received, but it's hard
10 to validate that quickly.

11 Q. And you have -- you have produced all documents
12 in your possession or control that were responsive to
13 that subpoena; is that correct?

14 A. Yes, sir.

15 Q. Now, going back to Tomotley, was Peter Sharar
16 there, S-H-A-R-A-R?

17 A. Who?

18 Q. Peter Sharar, do you know him?

19 A. I don't think I ever heard that name. I could be
20 wrong. But he definitely was not there.

21 Q. I believe you mentioned the IT person at
22 Tomotley. Is that Dave Hancock?

23 A. He's former, yeah. He had left by the time I was
24 there.

25 Q. And have you spoken to him since you were there?

1 A. I think he pinged me after the audit at one
2 point, saying, sorry, he made -- he made my life hell,
3 because he was saying nasty things to the press during
4 the audit, so...

5 Q. Turn to Exhibit 2, which is Tab 2.

6 A. Okay.

7 Q. What is Exhibit 2?

8 A. I don't know. It says Board of Selectmen
9 Meeting, Minutes of April 19th.

10 What is this?

11 Q. Hang on just one second.

12 For the record, this is Board of Selectmen
13 Meeting, Minutes of November (sic) 19th, 2021.

14 A. From where?

15 Q. I believe this is from New Hampshire.

16 A. Oh. This is Windham, okay.

17 Q. Okay. And turn to Page 2.

18 A. Okay.

19 Q. If you -- if you go down, it says, "Doug Logan,
20 CEO of Cyber Ninjas, advised his was an application
21 security company specializing in malicious code
22 detection."

23 Do you see that?

24 A. Yeah. So I have done malicious code detection
25 work. I pioneered some of that with Cyber Ninjas.

1 Q. And I believe you represented, as you have today,
2 that you did forensic work in Michigan and Georgia,
3 correct?

4 A. I don't recall saying. But, you know, if these
5 are the minutes, then maybe I did. But obviously I -- I
6 have said I looked at stuff in Coffee County, so it's
7 not wrong.

8 Q. And did -- did you submit a proposal to New
9 Hampshire with Russ Ramsland and Phil Waldron, were you
10 all together in some proposal, or did separate people
11 make proposals?

12 A. I don't recall if I actually ever submitted a
13 proposal or not. I did show up to this hearing. But
14 like I said, a lot of that time was a whirlwind. But I
15 was definitely not submitting a proposal with Phil and
16 Russ Ramsland. I was kind of annoyed after this hearing
17 that Phil had claimed that he had designed the Arizona
18 audit, which he had not taken part in any of that work.

19 Q. What other dealings had you had with Phil
20 Waldron, apart from -- he was at Tomotley -- was he at
21 Tomotley?

22 A. I do not believe so.

23 Q. Okay.

24 A. But Phil had a regular meeting with Jim Penrose.
25 Every now and then I would come in via -- via something

1 like Zoom. I think it was Wickr that was used during
2 that time period. Every now and then I was a part of
3 that meeting. But I was not even on a regular basis on
4 that. So I don't -- I probably had a few conversations
5 with him outside of that while I was at Tomotley. I'm
6 sure there is something I'm not thinking of at this --
7 you know...

8 Q. What was the relationship, if any, between Phil
9 Waldron and Jim Penrose?

10 A. I think they were just trying to share
11 information. Because apparently they were working on
12 things and wanted to make sure that, you know, effort
13 wasn't wasted. So that it was a tech meeting to share
14 what we had found, if anything, and vice versa.

15 Q. Who did Waldron work for?

16 A. I believe Phil Waldron worked for ASOG.

17 Q. And what is ASOG? Whose company was ASOG?

18 A. It's Russ Ramsland's company. I think Phil might
19 actually be a partial owner, but I don't know that.

20 Q. And it states here that Phil Waldron said he had
21 worked with Mr. Logan in Antrim County. Was that
22 correct?

23 A. I do believe that he was engaged to some level in
24 Antrim. I don't remember exactly what he did. I know
25 that people from ASOG definitely were because they wrote

1 that report, so...

2 Q. And so Bundren is the attorney for ASOG; is that
3 right?

4 A. I do not believe I knew that at that time with
5 Coffee County. But, yes, I have -- I have come to that
6 information.

7 Q. You state on Page 6, I think it is, at the top --
8 or they -- they say you state at the top certain text --
9 excuse me. It says, "He just encouraged all to watch
10 what they are doing in Maricopa; adding transparency is
11 critical."

12 Do you see that?

13 A. Yeah.

14 Q. And just describe what you mean by "transparency"
15 in this context and --

16 A. Well, they were going to do -- do an audit. You
17 know, live streaming every last little bit of what
18 you're doing 24/7 is a very critical part of that
19 transparency, and, you know, making sure that you're
20 holding accountable and you do things to a high
21 standard.

22 Q. What do you know of the work that Phil Waldron
23 did in Georgia?

24 A. Not much. I don't -- I don't know. Yeah.

25 Q. I may have asked you this before, but what role

1 did Patrick Byrne play in supporting the effort to
2 obtain Georgia voting system information?

3 A. I don't recall any specific involvement that he
4 had.

5 Q. Do you know him or know who he is?

6 A. Yes, sir.

7 Q. And who is he?

8 A. Patrick Byrne, he is the former CEO of Overstock
9 and founder of Overstock.

10 Q. Was it your impression that he was funding some
11 of these efforts?

12 A. I know that he's funded other efforts. I do not
13 know of anything that he funded associated with the
14 Georgia or things of that time. So I really don't know.

15 Q. While we're on that topic, were you paid for the
16 work that you did in Georgia?

17 A. No, sir.

18 Q. Should you have been paid?

19 A. Yes. I would -- I would characterize myself as
20 working pro bono.

21 Q. Pro bono?

22 But did -- did you have an agreement that you
23 would or might be paid by somebody?

24 A. No, sir.

25 Q. Sometimes I refer to it -- my line of work as

1 half bono, meaning you might get paid something, you
2 might not.

3 Was there some expectation that you would get
4 paid by somebody for your work? I'm not suggesting it's
5 bad or anything else. Just as a business person, what
6 you were thinking?

7 A. No. There was no expectation whatsoever. I
8 mean, my attitude at the time was this was an
9 opportunity to give back to my country to get to the
10 bottom of what was happening. And as long as I had a
11 profitable company that was providing what I needed, you
12 know, to live and survive and just continue to function
13 well, I didn't see any reason to collect any funds.

14 And so I paid almost all of my expenses
15 associated with it. And, you know, I -- and I was --
16 worked pro bono in that time.

17 Q. Did you have anybody working with you at Cyber
18 Ninjas on the Georgia -- on the work you did for
19 Georgia?

20 A. No, sir.

21 Q. Okay.

22 A. Up until the audit, I was trying to keep
23 everything very separate from my company.

24 Q. And then do you know Scott Hall?

25 A. I do not believe I ever talked with him. But if

1 he was involved in Election Integrity work in Georgia,
2 the probability is high I had a phone call with him at
3 some point.

4 Q. But you don't -- you don't recall?

5 A. No. He's not in my contacts. Yeah.

6 Q. I want to explore one sort of piece of this. In
7 the time period prior to you actually physically going
8 to Coffee County, say December 1st -- I mean,
9 January 1st, after you left Tomotley, to when you went
10 to Coffee County. Are you with me?

11 A. Uh-huh.

12 Q. And before you left Tomotley, you had not
13 received any information about any specific plan to do
14 any work in Georgia, correct?

15 A. I did not have any specific plans of any work
16 that was going to happen in the future. Obviously I
17 talked about the things, you know, that we had -- we had
18 tried to do in Georgia prior.

19 Q. And then at some point, mid January, I guess,
20 Penrose called you and said, we got some data out of
21 Georgia; is that right?

22 A. Correct.

23 Q. And were you involved in any way in planning or
24 facilitating the trip that SullivanStrickler took to
25 Georgia in the first or second week of January?

1 A. No, sir.

2 Q. Did you know it was happening at the time?

3 A. I don't believe I knew about it at the time.

4 Q. And then shortly thereafter, we'll get to the
5 documents, but shortly thereafter, Penrose told you, and
6 you obtained access to the data on -- on
7 SullivanStrickler's ShareFile, correct?

8 A. Yeah. When Jim called me up to tell me about it,
9 I recall being very surprised that -- that it had even
10 happened, so...

11 Q. And before going to Georgia, did you speak to
12 anyone else about going to Georgia in mid January, other
13 than Jim Penrose?

14 A. Yeah, Jeff Lenberg.

15 Q. Who else?

16 A. I don't remember exactly where in the time line I
17 talked with Charles Bundren, but I think one of the
18 times was before I went there.

19 Q. And Bundren -- was Bundren your attorney at that
20 time?

21 A. He was the attorney that -- yeah, that we were
22 doing work under. Jim told me he was engaged
23 specifically, you know, for this stuff, and he was the
24 main attorney on this work.

25 Q. And I just need to ask it again: You were not

1 aware at the time who -- who his client was?

2 A. I probably was aware at the time. I do not
3 recall.

4 Q. Do you know who it might have been, like it might
5 have been one of several?

6 A. It would be my assumption, but this is
7 speculation, that it was the County itself.

8 Q. Did you ever speak with any of the attorneys on
9 the ground for the County?

10 A. No, sir. I do not believe so.

11 Q. Had you ever spoken with a gentleman named Tony
12 Rowell, R-O-W-E-L-L? Do you remember that?

13 A. No.

14 Q. Prior to your visit, or even during your visit,
15 did you speak with any Georgia officials or Georgia
16 people that you can remember other than Misty Hampton?

17 A. No, sir. I mean, there's a possibility for that
18 on my phone calls I had conversations with -- with
19 someone who might have been. I don't really recall
20 directly. But nothing specific to the Coffee County
21 work or anything being done at Coffee. The only people
22 I talked with about that is -- was Jim and Jeff and
23 possibly Charles Bundren, as far as I recall.

24 Q. And then what -- what was your prior relationship
25 with Jeff Lenberg? How -- how did that connection get

1 made?

2 A. I don't -- I don't remember. I mean, Jim, I
3 think was the one who introduced me to him, but I don't
4 remember the context exactly. I don't remember.

5 Q. Was it your understanding that Penrose sort of
6 decided or suggested that the both of you go to Coffee
7 County?

8 A. I -- I really don't know. I am not sure if he
9 was the one who orchestrated that detail or not. He
10 told me that Jeff needed help and...

11 Q. Did you have -- did you have an understanding at
12 the time of the purpose of your visit?

13 A. As I recall, it was -- he said that some -- you
14 know, that some weird stuff had happened in Coffee
15 County and the clerk had some questions about it. And
16 so I had -- I went there with very vague information. I
17 remember that for sure. I don't remember exactly how
18 much information I had.

19 Q. Since the election system had already been copied
20 and you had access to it, why did you need to go to the
21 county, physically, to do your work?

22 A. Because they -- they -- the clerk had questions
23 on things. I -- I don't know. I was told I needed --
24 that Jeff needed some help, you know, and he was --
25 needed some answers and questions of the clerk there.

1 You know what we did, you have a copy of our report, you
2 know.

3 Q. And so when you got there, in Coffee County, did
4 Misty Hampton explain to you the questions that she had,
5 that she wanted you to look into?

6 A. Yes, sir.

7 Q. And just --

8 A. And she was just looking for answers. I mean, I
9 wouldn't say she wanted us to specifically look into.
10 You know, she was looking for answers on things. And so
11 we answered questions as best we could, and we said --
12 you know, Jeff came up with a way to -- to assess the
13 system. He suggested that it should be done as a way to
14 validate if what she said was real or not.

15 Q. And so --

16 A. And the people in the office did the work to make
17 it happen. You know, mostly I observed, you know...

18 Q. The -- why did you change the clock on the -- on
19 the EMS?

20 A. If you have malicious code that's in place to
21 enact imperfect -- well, here's the best way to give an
22 example. Are you familiar with Volkswagen? Have you
23 heard about --

24 Q. Yes.

25 A. -- you know, Volkswagens, the way that they

1 passed their diesel emissions test? You know what I'm
2 talking about?

3 Q. I do know what you're talking about, but for the
4 record --

5 A. So for the record, there's been very strict
6 diesel tests that are very hard for car manufacturers to
7 pass. And so in the case of Volkswagen, they actually
8 programmed their motor to identify when it's in a test
9 mode and to perform differently so that it would not
10 have the emissions output that it needed, so they could
11 pass when it was under a test, but when it was in the
12 real world, it could get the full performance of a
13 diesel engine and all the smog or whatever is associated
14 with it. So they basically backdoored their own system
15 with a code triggered under certain circumstances to
16 have a certain behavior.

17 So our assumption was that if you're -- if you
18 wanted to pass logic and accuracy testing, or any of the
19 other validations that went in place, that you would
20 likely, very similarly, have some sort of trigger. The
21 simplest trigger to have is a date based trigger.

22 And so if you want to test a system in the same
23 exact manner which gets used on election day, you put
24 the date to that time period of what it was on election
25 day. And then you know that if any sorts of triggers

1 that could have been in place are likely also to trigger
2 again, then you would see the -- the resulting behavior.

3 Because we didn't know if there was anything. So
4 we wanted to mimic the real world situation as much as
5 possible to make sure we have a scientific test that
6 would have a chance of reproducing the issue, if it
7 existed.

8 Q. Did you set the clock back when you left?

9 A. I didn't set the clock or unset the clock. So
10 that was something that was -- that was done by the
11 County. So I don't -- I assume that it was done, but I
12 really don't know.

13 Q. And did -- how did the County know to do that?
14 Did you or Mr. Lenberg suggest, first let's change the
15 date?

16 A. Part of the suggestion is in order to test it and
17 in order to explain as to why that would be -- create a
18 better test.

19 Q. And so when y'all were down there, the County
20 actually -- or Misty Hampton actually changed it
21 pursuant to your -- did you tell her how to do it?

22 A. I don't recall. Misty is very proficient on a
23 computer. I don't think I'd need to tell her something
24 like that. But I have no idea if we did or didn't.

25 Q. And you don't know whether it was reset, right?

1 A. I don't know. I mean, I can tell you that on
2 Windows it will automatically fix itself on certain time
3 intervals. So it should, you know, at least on the
4 Windows system. And I know that when you -- when you
5 boot up the ICP device, I believe one of the things that
6 displays for you to check and validate before you start
7 an election is the date and time. So, yes, it should
8 have been fixed. You know, naturally those things
9 should have resolved themselves, but I don't -- I don't
10 know.

11 Q. And then you also made a number of -- did you
12 scan a number of ballots when you were down there?

13 A. Did I scan any ballots? No. I did not scan any
14 ballots.

15 Q. Were --

16 A. Per the test, yes, ballots were run through
17 the -- for the ICP device.

18 Q. And those were ballots from the 2020 election?

19 A. I do not recall exactly how those were created.
20 That was not something I was a part of.

21 Q. Who was doing that?

22 A. I believe it was all done by -- by people in the
23 office. But beyond that, I'm not sure.

24 Q. Was it done pursuant to your instruction or -- or
25 what?

1 A. I mean, beyond saying, hey, we need to equi- --
2 equivalent ballots to run a good test, I don't know if
3 there was any -- any direction or instruction involved,
4 you know. You know, it was -- this is a way to do a
5 scientific test if you want to implement it.

6 Q. And the -- this particular test is something that
7 could not be evaluated simply by looking at the copy of
8 the software that SullivanStrickler had made, right?

9 A. Oh, absolutely. I mean, while it's -- there is
10 no -- there is no substitute for having a live version
11 of the systems. What you can do with a live version of
12 the system is drastically different than what you can do
13 with a forensic copy. It is immensely more complicated,
14 more difficult to work -- to do anything, similar type
15 of test of any sort. So, no, we could not just look at
16 a forensic image and know whether this was the case.
17 Absolutely not.

18 Q. Did it -- did it concern you, at any time, that
19 if you could have access, that kind of access to the
20 Coffee County system, that someone who didn't have your
21 motivation and integrity could also gain access and
22 figure out, for example, how to implant malware in the
23 system?

24 A. I mean, there's a statement in the security field
25 called security via obscurity, and they say security via

1 obscurity is no security at all. And what that means is
2 just because you think that no one knows about
3 something, you know, from a professional opinion
4 standpoint, and everyone in the industry would agree,
5 you know, that is no basis that someone doesn't have
6 access to it. You're supposed to -- the general thought
7 for security stuff now is to assume compromise in
8 everything that goes on.

9 So by all means, the -- it was -- I was careful
10 and wanted to make sure that none of the stuff I had got
11 in the hands of someone else. But I can assure you that
12 China can get their hands on this stuff.

13 You know, it's -- I mean, you're trusting, you
14 know -- by -- by the way election systems are designed,
15 they're in the hands of county clerks across the nation
16 that tend to not be the most computer savvy people. If
17 you think that someone can't find some way by which to
18 get some clerk to compromise the system via just purely
19 malware standpoint, you know, you're -- I mean, it's
20 just a very poor argument to make that no one in the
21 field would ever, ever suggest. I'm surprised it's a
22 legal argument in your case because it has no bearing
23 whatsoever.

24 Q. It's the defendant's legal argument. We're the
25 plaintiffs.

1 A. I understand. It -- it has -- it has absolutely
2 no basis whatsoever. It is absolutely ridiculousness.

3 Q. It's -- well, the ridiculousness is assuming that
4 the systems are physically secure enough to prevent
5 someone from having the kind of access that you obtained
6 in Coffee County, correct?

7 A. Correct. It's well documented -- well documented
8 across the country. It's absolutely well documented
9 across the country that people have stumbled into their
10 clerk's office and found the door open to something or
11 whatever. Not to mention -- I mean, there's known
12 accounts of individuals who -- who have literally --
13 this is not specific to election equipment, but the same
14 thing applies -- where they have paid people 250 to 500
15 bucks to plug in a USB into a computer, and people who
16 don't understand what the impact of that is, will do so
17 in the company.

18 Q. Well, what --

19 MS. LaROSS: Can you guys -- excuse me. This
20 is Diane LaRoss. Can you hear me?

21 MR. BROWN: Yes.

22 MS. LaROSS: I just wanted -- I've had trouble
23 getting off my mute button. But I did want to
24 interpose an objection to the references to the
25 defendant's argument in this case.

1 MR. BROWN: That's noted. Thank you.

2 BY MR. BROWN:

3 Q. What you've described, Mr. Logan, is frightening
4 to Georgians with the system in 159 counties. What do
5 you do about it?

6 A. I mean, the best security is always to make a
7 properly designed system in the first place. And I
8 mean, I have been involved in over 2,000 application
9 assessments. The software that I have assessed
10 associated with election stuff is -- is in the bottom
11 15 percent. You know, that's -- that's ridiculous for
12 stuff -- for what it does. So, I mean, it's -- I mean,
13 if the emperor has no clothes, you know, do you really
14 want everyone to be quiet?

15 Q. No.

16 What you described was -- you said it quickly --
17 but in the range of the quality of the security of
18 software and applications that you have seen, the
19 Dominion software in Georgia would fall in the bottom
20 15 percent of security and quality; is that correct?

21 A. I believe so. Especially when you take into
22 consideration that you view it as a high risk system and
23 you know that it's going to be deployed into
24 environments where you have got clerks who are not as
25 technologically savvy across the country. I mean, the

1 standard needs to be higher in those -- those states as
2 it's not -- you know, it's not a baseline. But I have
3 tested inventory control software with more controls and
4 stuff in place than I have, you know, Dominion's
5 software.

6 Q. You said hybrid -- what do you mean by that?

7 A. I'm --

8 Q. Maybe I misheard you, but I thought you said
9 hybrid in connection with the system. Maybe you didn't.

10 A. I said I've tested inventory control software
11 with a higher level of security than -- than the
12 election stuff that I have looked at.

13 Q. Are there particular -- without getting into the
14 weeds too much, are there particular features of the
15 Dominion software that push it to the bottom 15 percent,
16 in terms of security?

17 A. Sure. Let's just talk about public stuff. Okay.
18 So in Antrim, Michigan, based on Halderman's report,
19 they -- the votes for one candidate got assigned to
20 another candidate because they used sequential numeral
21 IDs, and they didn't match up what was on the card to
22 what was in the system. Okay.

23 It is a trivial check. An absolute trivial check
24 to validate that it's not just the number, but the name
25 that is on the ICP device also matches the name that's

1 in the system. And you might say, okay, they made a
2 mistake. You know, people make mistakes, it happens --
3 make mistakes, it happens. This is the first time it's
4 been reported to them. Right? So, no, no. There's a
5 news reporting out of the Philippines, I want to say in
6 2016, where the exact same issue that happened in Antrim
7 happened there as well. So they knew about the issue.
8 They're aware about the issue. And they didn't resolve
9 or fix the issue.

10 There's issues in DeKalb County, Georgia, that
11 something similar might have happened again, you know,
12 just based on the publicly available information. You
13 know, again, that's never as precise as actually looking
14 at things.

15 But when you have a company that cannot -- that's
16 software is designed in such a way that it does not have
17 the routine checks that should be in place, you know, to
18 make sure that the results are accurate, which is the
19 one job it has to do. You know, forget about just
20 vulnerabilities. User error should not be able to allow
21 to make it so that one candidate's votes gets attributed
22 to another candidate. It's not that hard to do that.

23 Q. Is there something about the software
24 architecture or -- that also makes it vulnerable rather
25 than the specific problems relating to the

1 identification of the device and the -- and the -- and
2 what the device is in Antrim?

3 A. Sure. I have a public report that's associated
4 with the Antrim case issued from Cyber Ninjas where I
5 have a number of things documented. The one thing, the
6 encryption key that's used to encrypt everything is in
7 plain text in the database. And the database security
8 and the way they have things is the user that you're
9 logged into the computer on, like by default, with a
10 password that never changes, that in some counties many
11 people have access to, or in some cases it's on a
12 Post-It note, that password has access to get the
13 encryption key that's more than enough to change the
14 results on the cards.

15 Q. What else? I'm not saying that's insufficient,
16 but what else?

17 A. I mean, that -- you know, passwords in the
18 database are just hashed once, whereas industry
19 standards for over ten years has been to salt them and
20 to hash them a hundred or more times and just to, you
21 know -- to explain that for the record, for those that
22 are not technically savvy. Okay.

23 So what a hash is, it takes a password, and it
24 converts it to a format that's not the password anymore
25 and can't easily be reversed back to the password, but

1 it's a unique value. So if I take the word hello, it's
2 going to generate a hash. It will look like a string of
3 gibberish to you. And if I type the word hello1, which
4 is only one character different, it's going to be a
5 completely different string with no resemblance
6 whatsoever to it. And so it's a way to store
7 information.

8 But the problem is, if you store it in the
9 database, just hashed once, it becomes possible to go
10 through the dictionary or other things and generate all
11 the hashes beforehand and then just say, hey, this value
12 doesn't match this value, oh, I know your password was
13 hello. So it's easy to match up.

14 So the best practice for over ten years has been
15 to -- to -- to use an adaptive hashing algorithm, which
16 basically means you hash it a whole bunch of different
17 times and you throw salt in front of it beforehand,
18 which is nothing more than just a random string on it,
19 so that you have to -- you know, you have to do
20 exceptionally, computationally intensive things to ever
21 figure out what the password is.

22 Another one that's not really string
23 vulnerability, but it's crazy. So there's a software
24 out there -- there's an open source software out there
25 called OpenSSL. Okay. OpenSSL is a library that a lot

1 of different organizations use as a basis for their
2 encryption and decryption of stuff. It is a very common
3 thing. There's libraries all across the board to make
4 it happen in almost every programming imagine --
5 programming language you can imagine.

6 Again, this is in my report -- actually, this one
7 might not be in my report. The Dominion software,
8 rather than calling a library to do encryption calls, it
9 actually calls an executable and runs the executable on
10 the device to do the calculations in it, which is just
11 poor programming.

12 And it's like one of those things, if you see a
13 car driving down the street, and it's got smoke coming
14 out of it, you don't need to be a mechanic to know that
15 there's a problem with the vehicle. It's not supposed
16 to -- you know, if you're running programs instead of
17 calling libraries as a programmer, you don't have to dig
18 that deep to see that the quality of programming is not
19 high.

20 Q. Specifically with respect to the scanner, the --
21 the ICC -- well, either one -- either scanner, was
22 your -- was your work in Coffee County focused on that
23 device or on the EMS or on the BMD? Are you following
24 me?

25 A. As I stated prior, I actually have not done much

1 analysis on Coffee County, besides the initial review.
2 I couldn't tell you the exact number of hours in that.
3 Most of the work I've done has been elsewhere, and I'm
4 talking about things that I've publicly -- publicly
5 disclosed in my expert testimony, which is why I can
6 reference them.

7 Q. And -- but what you were referencing in the
8 issues with the quality of the software, you're
9 referring specifically to Dominion software, correct?

10 A. Correct.

11 Q. And as it is in Antrim and in Arizona; is that
12 correct?

13 A. Correct.

14 Q. And in Coffee County, correct?

15 A. Yes. The majority of what I'm referencing is
16 what I did in Antrim, Michigan, that's in my public
17 report. But as I put in my declarations, they're
18 substantially similar, the software across the board.
19 When you have a naming convention, which is a number and
20 A or a number and B, that means those things are
21 virtually identical except for small differences. And
22 this is -- I can tell you that, you know, from observing
23 and seeing the way the software works and different
24 stuff, there's no visual discernible difference between
25 them. And that's what the small numbers mean, is those

1 things are practically the same thing.

2 Q. What information did you get, if any, before you
3 went to Coffee County about the anomalies that
4 Ms. Hampton had reported with respect to the scanning?

5 A. I don't believe I had any information until I got
6 there, but it's possible I had a small brief.

7 Q. And did she describe for you, when you were
8 there, the phenomenon that she was complaining about or
9 concerned about?

10 A. Yes, sir.

11 Q. And that's substantially what you reported back
12 today, right?

13 A. Correct.

14 Q. And did she give you any -- not that she had
15 to -- but did she give you any data or any support for
16 her assertion that the scanner was rejecting Republican
17 ballots with greater frequency than Democrat ballots?

18 A. No. And as I recall at the time, she wasn't even
19 saying it was definitely true. She -- you know, she was
20 saying, I felt like it was this way, but I don't know
21 any way to test it, how do we validate that? You know,
22 she definitely thought it was extremely weird, the
23 system just started working after the Dominion person
24 went outside. I think that was her biggest concern.
25 This she just thought was a weird anomaly that she

1 mentioned.

2 Q. And, again, you weren't -- to your knowledge,
3 now, neither you nor Mr. Lenberg were able to figure out
4 how Dominion did that, right?

5 A. On the ICC device, I believe that Lenberg has
6 isolated a setting which put it back in that same
7 behavior, a setting that does not make any sense to
8 control that.

9 Q. Okay. Explain that to me.

10 A. You're going to have to ask Mr. Lenberg for it to
11 be accurately represented. But the ICC device did not
12 have the behavior when ballots were run through it, but
13 if you changed the setting that was un- -- didn't seem
14 like it should be related to anything at all, it had
15 that -- that -- that behavior where it behaved
16 differently whether the candidate was Republican or
17 Democrat after you switched the setting from one side to
18 the other.

19 Q. Just looking back, I don't want to get into all
20 the statistics, but if you -- if you need to in your
21 answer, that's fine.

22 But if you look at Georgia, the results -- the
23 overall results of the -- of at least the Presidential
24 election were not out of line with the polling just
25 prior to the election. Do you recall that?

1 A. I don't recall that. What's -- what is the
2 relevance? What question do you want answered?

3 Q. Could you just explain in a little bit greater
4 detail, what -- well, the -- the mathematicians
5 determined that the -- that the ratios between the
6 candidates was too static across the various --

7 A. Be consistent. I mean, like, let's give an
8 exaggerated example. If every single precinct all
9 across Georgia had five for one candidate and seven for
10 another candidate, exactly, wouldn't you think there was
11 some problem?

12 Q. Right. But that was exactly the opposite of what
13 happened in Georgia, where you had dramatic differences
14 in votes between the candidates depending which county
15 you're in. And if you're in Clayton County, it was
16 about 90 percent for Biden. If you were in Coffee
17 County, it was about 30 percent. So what was the --
18 what were they comparing it to?

19 A. You would have to revisit -- you would have to
20 look at the work of Edward Solomon in order to get it.
21 But there was that equivalent from a mathematician
22 standpoint in how perfect the numbers were when you
23 looked at it in a certain way. And I'm sorry, I can't
24 give you -- if you'd asked me two years ago, I probably
25 could have given you a lot better explanation than I can

1 give you now at this point in time.

2 Q. This is a -- sort of a personal question. But
3 have you resolved, in your own mind, whether or not that
4 analysis was correct --

5 A. No, sir.

6 Q. -- one way or another?

7 A. No, sir.

8 Q. Okay.

9 A. I would need more data before I would ever say
10 that it was -- it was definitely true.

11 Q. Okay. I appreciate that.

12 MR. BROWN: Why don't we take a ten-minute
13 break, if that's okay, and I will get organized and
14 we'll be right back. Thanks.

15 THE WITNESS: Thank you.

16 THE VIDEOGRAPHER: Okay. Off the record at
17 10:22 a.m.

18 (Whereupon, a break was taken from 10:22 a.m.
19 to 10:39 a.m.)

20 THE VIDEOGRAPHER: This begins Media Unit
21 Number 2, and we're back on the record at 10:39 a.m.

22 BY MR. BROWN:

23 Q. Mr. Logan, back on the record.

24 We talked about setting a clock back on the EMS,
25 do you recall that, when you were in Coffee County?

1 A. Yes, sir.

2 Q. Is it your recollection that it was -- it also
3 would have been set back on the ICC computer?

4 A. For it to work, it would had to -- I mean, for it
5 to be effective, you would have to done it on all
6 systems. Yeah. You would want them to be in alignment.

7 Q. The -- the analysis that we have done indicates
8 that the date was changed to November 5, which is the
9 day after the election. Do you know -- do you know why
10 it would have been set to that date?

11 A. I don't, no.

12 Q. And also --

13 A. Maybe that was the day that the Dominion thing
14 happened?

15 Q. The odd thing about this scanning anomaly, as
16 reported by Ms. Hampton -- now, let me run this past
17 you, see if it jogs your recollection -- is that in
18 Coffee County, the -- they did a hand count after the
19 general election. And so they did a regular election
20 using the Dominion system, using the scanners, and then
21 they did a hand count of the presidential election. And
22 in the hand count it was off by one vote, the third
23 party candidate got one more or one less vote in the
24 hand count, recount of the general election, indicating,
25 I think, that the scanner issue, in terms of rejecting

1 Republican candidates, was not a problem in the actual
2 2020 general election.

3 Now, if that's the case, do you know -- do you
4 know what the sort of either anecdotal or evidentiary
5 source of Ms. Hampton's concern as to the frequency of
6 the rejection of Republican ballots?

7 A. Well, just that it was -- it was an anomaly and
8 that it stuck out. And first of all, the rejection --
9 when you talk an ICP device, you lit- -- it literally
10 spits the ballot back out. And you have to -- you can
11 reinsert it, I mean, as talked about in the analysis.
12 The ICC device, you'd have to take a stack and go
13 reprocess it. And reprocessing it, it will actually
14 rerun, you know, some of those other ballots.

15 So I don't -- I don't know specifically. I don't
16 remember that. And, you know, I don't remember exactly
17 what it was. I believe that some of this was actually
18 off of run-off data as well, but because the run-off had
19 just recently been run on the stuff. So it wasn't
20 necessarily that. But I don't remember the specifics to
21 go into any more detail.

22 Q. Do you recall that -- and Coffee County and other
23 places in Georgia, there were potentially three
24 different counts of the presidential election: The
25 regular election day accounting, hand recount, and then

1 an electronic recount next.

2 Did you know that that was what happened?

3 A. That -- that sounds vaguely familiar. But, you
4 know, my involvement in Coffee County really, I think I
5 was there two different days, as I recall it, you know,
6 somewhere around two or three hours each day. I'm
7 sure -- you guys have the video footage, you can
8 probably be more precise than that. So I don't -- I
9 didn't have a lot of information before I walked into
10 that, and I had done some work, you know, related to
11 Georgia in general, so I had some knowledge on that
12 stuff. But, no, I don't know.

13 Q. What work had you done in general prior to going
14 down there?

15 A. Just all of the stuff we've already talked about,
16 you know, about talking to people throughout Georgia
17 about things they observed and things that had been
18 going on.

19 Q. The -- getting back to the visit -- to your trip
20 to Georgia in December that didn't result in any
21 activity because of the difficulty with getting
22 authority, you drove down there with Penrose?

23 A. Correct.

24 Q. And then who came -- who else came with you?

25 A. Well --

1 Q. Was Conan -- Conan and Sanders with you in the
2 car going down there?

3 A. No, they came some other route.

4 Q. Did anybody fly in there?

5 A. I don't know. It's possible.

6 Q. Did you -- do you recall going to the election
7 offices themselves? You mentioned a random party. Was
8 there any other --

9 A. No.

10 Q. -- place to collect -- you don't remember going
11 to the election office there?

12 A. I never went to the election office there.

13 Q. Did anybody ask you to sign in or some sort of
14 sign-in log or anything like that?

15 A. No, sir. I was -- it was a party.

16 Q. And do you --

17 A. It was just a place to meet to have everyone talk
18 to figure out what -- what was happening. So, yeah.

19 Q. Now, to contrast it with Coffee County, your
20 understanding was that, indeed, you did have the
21 authority to do what you were doing, correct?

22 A. Correct.

23 Q. And how was that -- again, I want to make sure I
24 have it -- is that first, obviously, you get to the
25 election offices, and the person who says she's the

1 elections director lets you in, right?

2 A. Correct. I mean, if -- first of all, I mean,
3 the -- being told that an attorney is engaged
4 specifically on this. I believe I talked with an
5 attorney. Attorneys usually aren't into breaking the
6 law. That's just not their thing, you know. You know,
7 asked to be looked in by an expert by people that I
8 trust, you know, have in the past when it was clear
9 authority wasn't there have not proceeded with things.
10 Going to a place, there's elected people there. They
11 know -- you know, they know that you're -- we're coming.
12 We're welcomed. I mean, what reason would I ever have
13 to suspect that it wasn't authorized?

14 Q. That actually isn't the point of my question.

15 And that is, was there -- was there anything that
16 would give you any indication that you didn't have full
17 authority to do what you were doing?

18 A. No, sir.

19 Q. I'm not suggesting that what you said is
20 insufficient to establish authority, but did you have
21 any indication or anybody tell you that the board of
22 elections had approved of your visit or had -- had
23 engaged you or Bundren for -- for assistance?

24 A. I don't remember precise enough to answer that.
25 I believe that the answer to that is yes, but I would

1 not, like --

2 Q. Nothing specific?

3 A. As I stated earlier, with Jim Penrose, I asked if
4 permission had been obtained. I'm pretty sure that was
5 part of the conversation. And I'm pretty sure he said
6 it was the board. But I don't -- that was a long time
7 ago, and I cannot -- you know, that's somewhat
8 speculation based.

9 Q. You --

10 A. If there's any indication that it wasn't
11 authorized, I wouldn't have done it, like...

12 Q. You mentioned Dave Hancock from Tomotley?

13 A. Well, I think you mentioned him. But, yeah.

14 Q. You're right, I mentioned him.

15 And he apparently provided a number of emails
16 from the FightBack account to ProPublica. Did you know
17 that?

18 A. No, I didn't know that. I'm not surprised by
19 that, but I...

20 Q. Is it fair to say that although you both worked
21 together, that Lenberg was the lead of the two of you in
22 that effort to go down to Georgia?

23 A. I would definitely say that's true.

24 Q. When you reset the clock on the EMS and the
25 scanner, I take it that the -- at that point the scanner

1 was working correctly, right?

2 A. The ICC device, what functioned with the
3 configuration in place and did not have any issues
4 processing ballots, you know, it behaved exactly like it
5 had after the -- whatever happened whenever the Dominion
6 rep had the phone call, correct.

7 Q. And then you detected some code that could be
8 easily switched to make it malfunction; is that a fair
9 summary?

10 A. You need to talk to Jeff about that. That was
11 the stuff that Jeff was working on. I can only tell you
12 what he has told me about that work.

13 Q. Do you know anything about -- do you know Bob
14 Cheeley?

15 A. I'm familiar with the name.

16 Q. And how are you familiar with the name?

17 A. Probably in reading through the Curling stuff,
18 but I'm really not sure.

19 Q. Did you have any communications with him?

20 A. Not that I know of.

21 Q. And do you know about his operation in Georgia to
22 analyze Georgia election data, either in Fulton County
23 or anywhere else in Georgia?

24 A. Was he ever an attorney for Garland Favorito?

25 Q. He was.

1 A. Okay. I have talked to Garland Favorito's team
2 before. So there's a chance I -- I guess I probably
3 talked with him then.

4 Q. Did you do any work for Garland Favorito or his
5 operation?

6 A. I have answered a few questions about voting
7 machines before. Probably had two or three conference
8 calls. I couldn't even place when those were, I mean.
9 So I guess I have advised in some regard. I wouldn't
10 really call it work. I just, you know...

11 Q. Do you recall any specifics about the subject
12 matter of the advice, if you can disclose it?

13 A. I don't.

14 Q. You don't remember or you're not going to
15 disclose it?

16 A. No, I don't remember it. It's my understanding
17 for the most part I don't have the option not to
18 disclose it.

19 Q. Yeah, that's true.

20 Have you ever -- do you know Alex Cruse?

21 A. I don't know.

22 Q. Have you ever communicated with him?

23 A. I do not believe so.

24 Q. And I think I asked you this before, but you've
25 never heard of David Bossie, right, B-O-S-S-I-E?

1 A. I don't think so. I mean, the name sounds
2 familiar, but I have no idea who that is.

3 Q. Did -- before I forget, have you reviewed
4 Dr. Halderman's report?

5 A. Which report?

6 Q. The most recent report. It's partially under
7 seal, but there may be copies around. About the
8 vulnerabilities of the Dominion system?

9 A. I -- I believe I -- at one point in time, I read
10 a declaration associated with the report. But I have
11 never read any of the actual report.

12 Q. Do -- did you -- reading the declaration about
13 the report, do you recall any observations about what --
14 whether it was consistent with your understanding of the
15 Dominion system, or invalid, or smart, or anything like
16 that?

17 A. I don't recall there being enough specifics to
18 make any conclusion one way or another, besides what was
19 represented.

20 Q. When -- when you came to Georgia, was it your
21 understanding that you were doing work that was -- to
22 finish what SullivanStrickler had done, or was it sort
23 of a different enterprise, if that makes sense?

24 A. It's my -- my opinion -- my understanding it was
25 something completely different.

1 Q. I'm going to hand to you a document, Exhibit 3,
2 which is going to be Tab 4, and then also if you would
3 mark as Exhibit 4, Tab 4.5.

4 (Whereupon, Plaintiff Exhibit 3 was marked for
5 identification.)

6 (Whereupon, Plaintiff Exhibit 4 was marked for
7 identification.)

8 A. Okay. I'm opening Exhibit 3 now. I figured.

9 BY MR. BROWN:

10 Q. Yeah. And could you, for the record, tell me
11 what Exhibit 3 is.

12 A. So Exhibit 3 looks like a copy of the Signal
13 messages I pulled and turned over.

14 Q. And going -- I'm going to ask you some questions
15 about the chart that you have here.

16 A. Yeah.

17 Q. First, how did you select the -- the text to put
18 in this chart?

19 A. So I did searches specifically for Coffee, Coffee
20 County, Misty, I believe Georgia, GA, in addition to
21 specifically looking at the individuals that I could
22 remember had any association with anything associated
23 with Coffee County, and specifically looking through
24 their communications in the time period where they might
25 have said something.

1 Q. And did you prepare a list of the search terms
2 that you used, or do you have it? You don't have to
3 divulge it now, but did you prepare that?

4 A. No, I did not prepare that. I believe what I
5 just told you is pretty extensive.

6 Q. Okay. And then on the -- just going column to
7 column on Exhibit 3, you will see that the first column
8 says ThreadName at the top.

9 Do you see that?

10 A. Yes, sir.

11 Q. And what does that mean?

12 A. So what that means is that was the individual or
13 the group message that was being talked to. So in the
14 first example on the first page, you know, I had direct
15 messages with Ben Cotton on Signal. But if you go down
16 a little bit farther, you've got the
17 Coffee_County_Misty, and that is a Signal group where
18 messages were sent.

19 Q. And then the next column is obviously Message
20 From, right?

21 A. Correct. Who it was, who the text is from.

22 Q. Then the -- it's -- in terms of who the messages
23 were to, all of these would be to you, at least; is that
24 fair to say?

25 A. Yes. You know, in the case of -- if it says Ben

1 Cotton in the thread, maybe, the same as one of the
2 parties in it, then it was messages back and forth
3 between me and that party.

4 If it was a group, then everyone in the group
5 would have received that message, but I was a member of
6 that group or I never would have gotten it in the first
7 place.

8 Q. How can we tell if it's a group or not?

9 A. If the thread name is not the name of a person.

10 Q. Okay. And then it's a -- it's a group?

11 A. Yeah.

12 Q. Okay. I think the phone number and Sent Time is
13 clear enough.

14 And then the Message Text, that's just a --
15 that's exactly what the text was, right?

16 A. Correct.

17 Q. Okay. If you would --

18 A. I mean, obviously if you take a look, there's
19 some weird characters go through. I don't know
20 exactly -- somewhere in the process, the process -- it
21 means there's some small changes and stuff like that.

22 If you look at Number 3 of the -- the second one,
23 "yeah, but the arena" -- I mean, obviously there wasn't
24 really a trademark symbol in that. I don't know exactly
25 where that came from or how that worked, but...

1 Q. Okay. I think there's question marks in there
2 that are sort of bizarre also?

3 A. Yeah. There's just some character changes. I
4 don't know exactly how or why that happened. Something
5 to do with the process I used to try to extract these,
6 but...

7 Q. Fair enough.

8 Turn, if you will, to Exhibit 4.

9 A. Okay. I'm not seeing Exhibit 4.

10 Q. It might take a minute for them to load it.

11 A. Oh, there we go. I got it now.

12 Q. And just for the record: Did you receive the
13 email from me with this document last night?

14 A. The one that you sent at midnight? Yes. I
15 received it about, you know -- about 20 minutes before I
16 connected to this stuff. I have not had a chance to
17 review anything.

18 Q. Well, I will represent to you that it is an
19 attempt to sort by date Exhibit 3. Are you with me?

20 A. Yes, sir.

21 Q. The documents are what they are. In other words,
22 there's ways to verify the completeness of it. But just
23 for purposes of expediting your examination, I found
24 that if -- if we were going through Exhibit 3, we would
25 get whiplash going back and forth because of the dates.

1 And so I thought it might be easier to go
2 chronologically.

3 But do you see that, looking at Exhibit 4?

4 A. I see that. But I -- I don't have any way to
5 test whether they're the same. And I don't have enough
6 recollection of these conversations where I am going to
7 catch things that are a word different, which can make a
8 significant impact.

9 Q. Okay. Well, do you see the -- we can go back and
10 forth, if you want. But what I have also done, in
11 columns F and H, is include the original page number and
12 the original line number on that page.

13 A. If you -- if you would like me to have general
14 comments or general information, you know, I'm
15 comfortable utilizing this. But if you're going to say,
16 did you say XYZ, I'm going to want to see it in the
17 format I gave it to you.

18 Q. That's fine.

19 One of the things about your -- I'm not
20 criticizing you on this. One thing I -- I don't know
21 how this happened, but when I made Exhibit 4, there
22 appeared a pre A column that had the line number on it.
23 Do you follow me on that?

24 A. I hear what you're saying. I have no idea why
25 that would be the case. That's not anything that

1 existed, so...

2 Q. You didn't -- you didn't -- I'm not suggesting
3 this is bad or anything, but you didn't hide any columns
4 in your printout, did you, or you didn't intend to?

5 A. No. No, sir. I mean, in Signal, there's a
6 conversation I.D., which is a GUID, which is basically
7 very long text that's associated with it. And so
8 before, I didn't bother to give you guys that, and I --
9 you know, I hid that before I printed it out. But it's
10 nothing like 1234. I mean, it's literally random As,
11 Bs, ls, and so forth about -- of a certain character.
12 So I didn't figure that would be much use to you.

13 Q. No, it was very -- it was very helpful. And I
14 appreciate that.

15 What I'm saying, just for the record, is that I
16 did not put that column there. That is something that
17 appeared when I did the sort.

18 A. It must have been something when you converted
19 the PDF to. So it must have added it somehow.

20 Q. And then I will represent the -- that the
21 original page number and the original line number, to
22 the right, is something that I added to this --

23 A. Okay.

24 Q. -- for purposes of being able to check back and
25 forth, the accuracy on it.

1 Okay. Let's go to Exhibit 4 and take a look at
2 it.

3 A. This is 4.5? Tab 4.5? Or Exhibit 4?

4 Q. Exactly. Exactly. Thank you.

5 And you started your search, it looks like at
6 January 14, correct?

7 A. No, sir. I searched everything I had access to.

8 Q. So going far -- how far back?

9 A. Based on the analysis that my Signal messages
10 went back to January 10th.

11 Q. So you started using Signal on January 10?

12 A. No, sir. I -- used Signal for a very long period
13 of time. However, the way I was ultimately able to
14 extract these were from the desktop portion use of
15 Signal. And I had some issues with my computer that had
16 required me to format my hard drive. Some were
17 around -- I think I ended up doing it somewhere around
18 January 9th. And so this is from Signal messages from
19 that point on, is when I finally reinstalled Signal on
20 the device.

21 Q. And so the date that you chose was a function not
22 of the information, but of the -- the limitations of
23 what was actually on your computer?

24 A. Correct. If I put a date range on this, you
25 probably wouldn't have gotten some of the other messages

1 that I found that happened later on from the audit and
2 stuff. I didn't put any ranges on it. I searched
3 everything I had.

4 Q. Okay. So there may -- there may have been Signal
5 messages before that were germane, but you're just
6 unable to recover them; fair to say?

7 A. Correct. It's -- I do not believe this is
8 anything before this associated with Coffee County. But
9 in generically, if you're talking about conversations
10 with Georgia, there's a high probability that I had a
11 Signal message sometime after November, you know, in --
12 between November and January 10th, there was some
13 message over -- over -- on Signal that was associated
14 with Georgia in some fashion that I don't have a copy of
15 at all. It's highly likely.

16 Q. Okay. Let's start going through these. And I'm
17 not going to go through every text, trust me.

18 But the first one, the thread name is Jim
19 Penrose. That means it's just Jim Penrose that you're
20 communicating with, correct?

21 A. Correct.

22 Q. And then it indicates here on January 14th, "I
23 just heard Conan say that 105 remote log-ins happened on
24 the EMS"?

25 A. Uh-huh.

1 Q. Do you see that?

2 A. Yes, sir.

3 Q. And there's some back and forth of whether or not
4 that information from Conan was correct. Do you recall
5 that?

6 A. Yep.

7 Q. And what was the issue there?

8 A. I don't know what he was looking at. I did not
9 see it. And I think that shows in the chat messages.

10 Q. Right. And so you weren't able to verify that
11 there were in fact 105 remote log-ins, right?

12 A. All of the remote log-ins I found were not from
13 any external IP address, as I recall from -- and just to
14 be clear, I'm basing this mostly off of these messages
15 themselves. I don't have any recollection of this
16 conversation directly.

17 Q. And what you're referring to on "remote log-ins
18 happened on the EMS," are you referring to the EMS that
19 was on the SullivanStrickler ShareFile site?

20 A. Correct. Correct. Specifically in the Windows
21 event logs there is an entry called a remote log-in.
22 There's various different remote log-in types that you
23 have. You know, literally they have a code, I think
24 it's -- was it 1 through 4 or something like that? And
25 that's -- when we're talking about remote log-ins,

1 that's what I'm talking about.

2 Q. I'm taking my time. And by doing that I'm
3 actually shortening the questions and answers because
4 I'm skipping over things that we don't need to talk
5 about. But let me just run through these real quick.

6 If you would turn to Page 2 of Exhibit 4. On the
7 first line, you say to Mr. Penrose, "BTW" -- which I
8 guess means by the way -- "the public IP would never be
9 in the logs unless it was sitting directly on the" --
10 and then it stops here.

11 But is that what you were just referring to?

12 A. Sorry. I'm just looking at this closely.

13 Yeah. I'm saying the logs would never have the
14 public IP, unless it was literally directly on the
15 internet without a firewall in front of it. I don't
16 believe in my messages that's truncated. I believe that
17 has the whole statement.

18 Q. Okay. And then your -- the next message is, "Did
19 you see my question before about the leaked NSA tools?"

20 What are you referring to there?

21 A. So somewhere around this time period -- I mean, I
22 know what the leaked NSA tools are. I actually have no
23 recollection of saying this. So I'm going to tell you
24 about publicly available information.

25 So somewhere around this period of time, there

1 was a hacking group that had released some tools that
2 were available at the NSA that allowed -- that one of
3 which allowed the scrubbing of logs in order to, you
4 know, make things no longer appear in the Windows event
5 logs.

6 And so my concern was as to whether data had been
7 removed from the Windows event logs or not if, you
8 know -- if anything hadn't happened. Because my
9 assumption in all of this has always been that -- you
10 know, a nation state, foreign actors, most likely
11 adversary, to be potentially interested in voting
12 equipment.

13 Q. So the concern was that the NSA tools could erase
14 event logs to obscure or erase some sort of penetration?

15 A. Correct. So, hypothetically, if there had been a
16 remote log-on from some other site, where the system was
17 accessed and things were changed, if you had the tools
18 that had been made publicly available, a/k/a they were
19 available to more than just the NSA, it would be
20 possible to then remove those logs and then -- and then,
21 you know, there would be no necessary record to that.

22 I seem to recall -- I don't remember if this
23 conversation or just in general, where I asked -- asked
24 Jim if there was any indications of that happening, if
25 there was any telltale signs of that happening. So I

1 remember his background was the NSA, and so my hope was
2 to find out, you know, is there any way we could tell if
3 that happened.

4 Q. And what was his response, if you recall?

5 A. I don't recall him having any answer that was
6 material. So if he knew the answer, he probably
7 couldn't tell me, but I don't recall him even suggesting
8 he knew the answer.

9 Q. Okay. A couple of lines down you ask -- or the
10 next line down, sorry -- and we're still on
11 January 14 -- he says -- oh, you say, I'm sorry -- by
12 the way, "did you get ahold of Ben?"

13 Do you see that?

14 A. I do see that.

15 Q. Is that Ben Cotton?

16 A. I really have no recollection. It's -- it's
17 unlikely. I don't think I knew Ben Cotton at that point
18 in time.

19 Q. Okay. And do you know who -- what y'all were
20 talking about, "I may have another guy to go to" -- or
21 "guy to go"?

22 A. No. It's possible -- I mean, just reading this,
23 it's possible that I'm wrong on when I talked to Ben,
24 and I did know him then. I don't know.

25 Q. Okay.

1 A. I'm -- I don't know -- I really -- most of these
2 messages, I have no recollection of them, besides
3 reading them myself now. So it's hard for me to give
4 additional context.

5 Q. Sure.

6 And when did you -- just put aside this exhibit
7 for the moment, and without -- without referencing the
8 Signal exhibits, how did you come in contact with Ben
9 Cotton, to the best of your recollection?

10 A. How did I meet him?

11 I don't remember. Someone introduced me to
12 someone who introduced me to someone. It was not
13 direct. I feel like -- I don't know. Anything I have
14 would be speculation.

15 Q. Sure.

16 He -- Mr. Cotton has given a deposition in this
17 case, and his name also appears on the log of downloads
18 that we obtained from SullivanStrickler.

19 A. Uh-huh.

20 Q. So you knew that he also had access to the Cotton
21 County (sic) data, right?

22 A. I knew that he eventually got access to that,
23 correct.

24 Q. Okay. And that he worked with Penrose, or
25 some -- somehow worked with Penrose, did you know that?

1 A. Yes. I --

2 Q. Actually, you can skip that one. But did he work
3 with Penrose?

4 A. I do believe that he worked with Penrose at
5 times, correct.

6 Q. And who is Dennis Montgomery?

7 A. I -- you know, I -- I know more now than I knew
8 at the time. Dennis Montgomery, former government
9 worker, I think is the idea supposedly he is an expert
10 when it comes to -- I don't know. It -- it's hard to
11 explain. He's -- I believe he's the -- one of the
12 proponents of the Hammer and Scorecard stuff, which is a
13 theory by which all voting machines were remotely
14 accessed by some special software created for the
15 government to compromise systems and that the votes were
16 changed through that.

17 Q. You said that with a little skepticism. Was that
18 intentional?

19 A. I mean, I think my opinion was likely reflected.

20 Q. Well --

21 A. I have seen nothing that I find credible to
22 suggest that.

23 Q. You called -- you called him supposedly an
24 expert, sort of like you would say supposedly a good
25 lawyer?

1 A. I -- I did not purposely do that. But, yes. I
2 have been told he was an expert in such things. I have
3 never talked to him. I don't know.

4 Q. And so Conan was working with Montgomery then,
5 apparently?

6 A. Apparently. I didn't -- I didn't know any of
7 this at this point in time. This again -- it's always
8 fun to read your old messages.

9 Q. Right.

10 If you go down to the message at 21:50, there's
11 several, but one of them says, "Has Conan run all of the
12 IPs via ARIN to figure out who owns the targets?"

13 A. I'm sorry, what line are you in?

14 Q. It's -- it's about sixth from the bottom, 21:50,
15 "has Conan," do you see that?

16 A. Yes.

17 Q. Just to translate, but what is ARIN, A-R-I-N?

18 A. So ARIN is a database that lets you take an IP
19 address and convert it into a physical location and who
20 owns it as well. You know, it's what organization and
21 usually has a physical location with it as well.

22 So around this time period there was a
23 spreadsheet that had been provided, presumptively from
24 Dennis Montgomery, that said, hey, here's a list of
25 places that have been compromised by this as to the

1 Hammer and Scorecard thing, and here's the IP address
2 that it came from, and here's the IP address that they
3 attacked, here's how many votes were changed.

4 And this is a conversation -- based on my reading
5 of it -- it's a conversation based on that spreadsheet,
6 where I said, hey, if you say you're attacking Coffee
7 County, you shouldn't have an address for -- did I say
8 it was Kansas? You know, it should say Georgia. This
9 is part of what made that data make no sense and it just
10 looked fabricated.

11 Q. Okay.

12 A. Happy to keep talking about this, but I don't
13 think anything here is going to be useful to you.

14 Q. I'm with you there. That's okay.

15 Let me drop down to -- well, turn the page to
16 Page 3 of Exhibit 4.

17 A. Is that one page beyond where we are? Sorry, I
18 lost track.

19 Q. That's correct, yeah. Page 3.

20 A. Okay.

21 Q. The third line you say, "Are you physically with
22 C and T now?"

23 Do you see that?

24 A. Uh-huh.

25 Q. That's to Jim Penrose.

1 Who were you referring to?

2 A. I would assume it was Conan and Todd.

3 Q. And then if you look at two lines down, he asks,
4 "Can you run a cast vote report in JSON format from the
5 EMS for Coffee County."

6 Do you see that?

7 A. Yes, I do.

8 Q. And did you run a cast vote report in JSON format
9 from the EMS for Coffee County?

10 A. I actually don't remember this at all. But in my
11 files that I turned over to you, included cast vote
12 records, so I believe the answer is yes.

13 Q. Do you recall the cast vote records being posted
14 on the internet by anybody?

15 A. I know that Jeff O'Donnell is having people FOIA
16 and request them and has a whole bunch of them on his
17 site. But beyond that, no, I don't. I'm not familiar
18 with that.

19 Q. And who was that that you mentioned?

20 A. Jeff O'Donnell.

21 Q. And who is he?

22 A. He is an individual that's done a lot of analysis
23 and posts cast vote records, and specifically has a
24 website that does analysis on them to look for various
25 different things.

1 Q. So sort of a library of cast vote records?

2 A. Correct. He has thousands of them from across
3 the country at this stage in time.

4 Q. And the next line is from Penrose, it says,
5 "Charles Bundren wants us to give it to one of his
6 analysts."

7 Do you see that?

8 A. Correct.

9 Q. And do you know anything more than -- do you
10 remember anything more about that, other than what
11 appears here?

12 A. It would be my assumption that the next chat
13 section where it's a conversation with Larry was with
14 the analyst in question.

15 Q. Yeah, I don't see Larry.

16 A. Go down to what's -- Line 65 on that same page.

17 Q. Yes -- oh, Doug_Larry -- oh, he's a group, okay.

18 And so who -- who are Doug and Larry in the Doug
19 and Larry reports field thread?

20 A. Well, I'm Doug.

21 Q. All right. And Larry is who?

22 A. I believe it's Larry Marso.

23 Q. How do you spell that?

24 A. It's actually in the column Message From.

25 Q. I got that. M-A-R-S-O.

1 And who -- who is he?

2 A. It's my understanding that he is a former
3 Dominion employee who has built software to do analysis
4 in cast vote records specifically. And I don't know if
5 I knew this at that point in time. You know, I think it
6 was just, you know, Jim did an introduction. Jim was
7 part of that group as well, as you can see from the chat
8 messages.

9 Q. If you look at Line 63, and I'm referring to the
10 far left column line.

11 A. Yeah.

12 Q. This is the -- in the Coffee_County_Misty thread
13 name.

14 Do you see that?

15 A. Yep.

16 Q. And so that was a group of people that that
17 Signal message would have gone to, correct?

18 A. Correct.

19 Q. And do you know who was in that group?

20 A. I believe it was Jim, Misty, Jeff, and I, if I
21 recall correctly.

22 Q. And there's some funny characters here, but the
23 general thrust of this is, it looks like Jim introducing
24 Misty to you and Mr. Lenberg; is that fair to say?

25 A. Correct.

1 Q. Here Mr. Penrose says, "I wanted to start this
2 group so we can get to the bottom of any outside access
3 to your voting machines."

4 Do you see that?

5 A. Yes.

6 Q. And is that with -- is that with reference to
7 outside access generally or specifically with a
8 particular suspicious event?

9 A. It would be my understanding, in what I know in
10 reading that message now, that that has to do with what
11 I described earlier, where Dominion went outside, and
12 then things started to work. And therefore the
13 presumption would be what type of outside access
14 happened in order to enable that to happen.

15 Q. Given your expertise, what would you look at on a
16 system to determine if there had been that kind of
17 outside access? What sort of tracks would be left if
18 that occurred, if any?

19 A. Specifically, one of the things I would take a
20 look at is the Windows event logs to look for remote
21 log-ons and remote access in that regard.

22 Beyond that, in general, these EMS servers and
23 Windows event logs have their log levels set to the
24 default for Windows, which is not sufficient to really
25 dive into the details of what happened.

1 I will specifically state that my background is
2 in applications security, which is a different thing
3 than incident response. And so I can -- I can know how
4 to answer these questions to a certain level, but it's
5 not my expertise specifically to dive into the details
6 of what happened in a breach.

7 Q. So incident response would be if there is a
8 hacking or some kind of event, go and figure out what
9 happened, right? And that's a different kind of
10 expertise?

11 A. Correct. That's the sort of expertise that
12 someone like Ben Cotton brings in.

13 Q. In your -- in your experience -- I probably
14 should have asked this before -- but the -- your field
15 is a -- is a vast field with a lot of different
16 subspecialties. Do you follow me?

17 A. Yes, sir.

18 Q. And how -- how do you, just in terms of your
19 business, separate out the different fields?

20 Like, you know, for me, it would be litigation,
21 corporate law, labor law, whatever. But how -- how
22 would you distinguish between different subspecialties
23 in your field?

24 A. You know, you would have application security
25 focused. You have network security focused. I mean,

1 applications securities is my expertise. Then you tend
2 to have more your in-house -- so you have your security
3 operations center and everything associated with them,
4 and then the incident response, and respond to things
5 that happen.

6 You -- sometimes people divide things out more
7 generically, you know, and have offensive security,
8 because you've got your teams that do primarily
9 penetration testing. And sometimes within penetration
10 testing they'll have a focus usually on network security
11 and along those lines.

12 I don't know if that -- that's probably not
13 concise enough, but hopefully it's helpful.

14 Q. In terms of applications, would you necessarily
15 have to be -- have expertise in both application
16 software and operating software, correct?

17 A. I am not sure if I understand what your question
18 is.

19 Q. Well, a lot of times people separate application
20 software from operating systems. Is that -- but yours
21 would necessarily encompass both, right?

22 A. Yeah. If -- with application security, if
23 anything is built from an application standpoint, then
24 it does apply to application security. Whereas
25 typically your Windows operating system -- like it

1 really -- it's -- any of these areas, there is some --
2 you know, there's overlap between things, if that makes
3 sense.

4 Q. Sure.

5 A. So typically in your application security, you're
6 going to work with custom-built applications. So I
7 would be hired by the person who is building an
8 application to assess its security, to make sure that
9 it's not vulnerable and in order to help them remediate
10 any issues that are found through things. And that
11 could be through application security penetration
12 testing where I'm testing for vulnerabilities. That
13 could be through code review. And that could be a
14 generic code review just looking for specific
15 vulnerabilities or malicious code review, which is
16 something we pioneered, which is specifically looking
17 for code that had been changed, potentially on purpose.

18 There's also areas where you're doing what's
19 called threat modeling which you're enumerating the
20 risks associated with a given system. Everything I did
21 was from an application security standpoint. And so
22 with that skill set and the capability, I might -- I
23 could be hired by Microsoft to take a look at the actual
24 full operating system, but it's not very typical for me,
25 you know, to do so because it's a very specialized sort

1 of thing.

2 Whereas your network security individual is the
3 one who is going to understand systems on a network,
4 that usually understands operating systems, operating
5 system vulnerabilities really well. We -- my company
6 does a small amount of network security, and so, like, I
7 know some of that stuff. But that's certainly not what
8 I would say is my expertise.

9 Q. Did you do a malicious code review in Coffee
10 County?

11 A. I never had the source code, and malicious code
12 detection really requires as much information as
13 possible. Ideally you have both the source code and
14 access to version controls so you can see what changes
15 were done by developers over time in order to ever make
16 any type of attribution as to whether it could or
17 couldn't be a malicious code.

18 Q. So you wouldn't have been able to do a malicious
19 code review even if you wanted to; is that fair to say?

20 A. There's some analysis that can be done to take a
21 look to try to identify if malicious code had been
22 injected. I would never classify it as malicious code
23 review because I didn't have access to the code.

24 When you're taking a look at an application,
25 there's -- there's two basic ways to take a look at

1 things. There's what's called dynamic analysis, which
2 means you're -- you're working with an application
3 that's been deployed. And so literally a web
4 application is in process and use. You know, an
5 application is running at the time. And your standard
6 penetration testing is usually done on dynamic analysis
7 or some automatic vulnerability scanners are there.

8 And there's static analysis is when you're taking
9 a look at the code review and going through it. There
10 are levels of static analysis that can be done where you
11 are just looking at DOLs and so forth, and some of that
12 analysis stuff could be done, you know, on a system.
13 But for the most part, no, it can't. It would require
14 the code to do any type of in-depth analysis.

15 Q. Looking back to Exhibit 4.

16 You'll see the dates on this. This is
17 January 15. This looks like the days running up to your
18 actual visit there on the 18th. Is that consistent with
19 your recollection?

20 A. I don't specifically remember these messages.
21 But obviously I know when I was there, and these dates
22 match up with it. So, yes, it makes sense.

23 Q. Let me direct your attention to the next page of
24 Exhibit 4.

25 And if you look at Line 88, it's a message from

1 Jim Penrose to the Coffee_County_Misty thread.

2 A. Uh-huh.

3 Q. It says, "Quick question, how do you get your
4 vote totals from Coffee County to Georgia?"

5 Do you see that?

6 A. Uh-huh.

7 Q. And then there's some back and forth. She says
8 it's "through election night reporting."

9 Do you see that?

10 A. Uh-huh.

11 Q. And do you recall why that was -- why that was
12 important for what you were doing?

13 A. I don't think it was necessarily directly tied
14 with what we were doing. We had just -- were curious as
15 to how results got reported all the way across the board
16 in order to explain any general anomalies that we had
17 throughout. I don't think it was directly tied. And
18 that was one of the bits of information that was
19 surprisingly hard for anyone to ever mention is exactly
20 how -- what steps does -- do results when they get
21 reported, where do they hit along the way?

22 Q. Did you get satisfactory answers to those
23 questions?

24 A. (No audible response.)

25 Q. Well, you indicated it was difficult to figure

1 out or to get a straight answer to.

2 A. Yeah, I'm just -- I'm just trying to remember
3 exactly. I mean, I think that the answers we got from
4 Misty, that the best that we had so far, which were in
5 here, were okay. I still wanted -- I'm still really
6 curious how Edison gets the data, you know, as an
7 example, you know, how -- what exactly where it pulls it
8 from and, you know -- and -- because every single point
9 where something touches something, is a point where
10 something touched something is a point where something
11 could be intercepted or manipulated in some manner. So
12 it's always good to understand the flow of information
13 and how -- how votes are being sent.

14 Q. If you go to the next page, Line 97, Misty --
15 Misty says, "I download on a thumb drive from the EMS
16 computer then take the thumb drive to my desk computer
17 and put it on the" -- how do you say it -- "Scytl site"?

18 A. Scytl.

19 Q. -- "and then I assume that sends it straight to
20 the state."

21 Do you see that?

22 A. Yes, sir.

23 Q. And so to get the -- these are actual election
24 results that she's referring to, correct?

25 A. Correct. She's saying that after an election she

1 takes a USB drive, plugs it in EMS server, which is
2 supposed to be air gapped and off the internet, and gets
3 those results, goes to her computer and uploads them to
4 effectively -- you know, Scytl is a third party. And
5 then apparently Scytl is the one who reports it to the
6 State.

7 Q. Is that a secure or advisable way of transmitting
8 the information?

9 A. If you have an air gap system, the only way you
10 can interface it is through something through a thumb
11 drive. So in that -- in that regards, you know, they
12 don't have any other option.

13 But as far as the -- the -- is the first place I
14 want results published to a third party that has, if I
15 recall correctly, gone out of business and it's unclear
16 whose ownership is? No, that doesn't sound like a very
17 good -- very good process.

18 And also specifically, I asked -- I think it
19 might have been part of this conversation, I know I
20 asked Misty at some point, is there anything that
21 requires you to later on compare the official results to
22 make sure it matches your real results? And I believe
23 she said that she does that, but, no, there's no
24 official process in that. And that means if someone
25 changed those results in the middle, no one would even

1 necessarily know because there's no process that
2 requires them to make sure they're the same thing.

3 And certainly if it was changed by tens of
4 thousands of votes, everyone notice. But what if it
5 was -- what if it was 1 percent of the votes everywhere,
6 you know? And we certainly are finding that more and
7 more elections are determined by less than 1 percent of
8 the votes.

9 Q. Well, and then there's also the down ballot races
10 that people don't spend that much -- might not look at
11 more closely, right?

12 A. Correct.

13 Q. And I believe the exchange that you're referring
14 to between you and Misty is on Page -- Line 101 and 102.
15 "Is there any part of the process where" --

16 A. Yeah.

17 Q. -- "you are supposed to confirm," and she says,
18 she does it, right?

19 A. Yeah. But if -- if it's not part of the process,
20 the mandated process, then -- then your average clerk
21 isn't going to do it. And I think Misty was
22 exceptionally functional and good at her job in making
23 sure the right things were happening. You know, not
24 everyone is that way with their jobs.

25 Q. Were the messages that we see here on Exhibit 4

1 your first communications with Misty Hampton?

2 A. Yes. To the best of my recollection, yes. And I
3 don't know how it would be any way different than I
4 remember.

5 Q. Do you know Greg Freemyer?

6 A. I do. I've talked with him a number of times.

7 Q. And when did you first start communicating with
8 him about access to Georgia?

9 A. About access to Georgia?

10 Q. Yeah. Or about getting information about
11 Georgia, about the Georgia election system.

12 A. I can tell you that when we were looking for --
13 possibly for getting forensic images places and we were
14 looking for vendors, it's somewhere late -- you know,
15 late November, I'd say probably within -- within a week
16 of -- somewhere between November 14th and November 21st
17 is probably when I first reached out and talked to him.
18 Certainly within a week from that date if I am
19 remembering wrong, as a possible person to do
20 acquisitions. I don't remember if it was specific about
21 Georgia or not.

22 Q. That's what I was going to ask. At that point,
23 it may or may not have been specific to Georgia, right?

24 A. Being that they're a Georgia based firm, we
25 probably had Georgia in mind.

1 Q. But you don't recall specifically if Georgia was
2 on the hit list from the very beginning, right?

3 A. Without a doubt, we were -- we were calling and
4 trying to find places within Georgia around that time
5 period. So, yes, I don't think I can say that it wasn't
6 on the hit list. I don't remember any specifics.

7 Q. And was it on the list because the election was
8 so close or because of anomalies or some other
9 information?

10 A. I -- I think it was because the -- the attorneys
11 in question were licensed in Georgia.

12 Q. And who -- who was that?

13 A. So specifically, initially, we were working with
14 Lin Wood.

15 Q. Okay.

16 A. And, you know, I think eventually Sidney Powell
17 ended up working there, and she had someone on her staff
18 at least who was licensed in Georgia.

19 Q. Do you recall who that was?

20 A. What was her name? No. No, I don't think I do.

21 I mean, obviously, Georgia was also a
22 battleground state, so ...

23 Q. Right. Let's look at -- this is a little bit out
24 of sequence, but I'm going to go to Tab 12, which is
25 the -- and mark it as Exhibit 5.

1 (Whereupon, Plaintiff Exhibit 5 was marked for
2 identification.)

3 MR. BROWN: And Tab 12 should be the
4 SullivanStrickler log file.

5 A. There we go. Okay.

6 BY MR. BROWN:

7 Q. Is Christina Reed the name of Sidney Powell's
8 lawyer in Georgia? Does that ring a bell?

9 A. That doesn't ring a bell at all.

10 Q. Do you know Stephanie Lambert?

11 A. I do.

12 Q. How do you know her?

13 A. She was added as counsel on the Antrim, Michigan
14 case. I'm trying to think if that's the first time I
15 met her. I think it might have been the first time I
16 met her. But because of my work on Antrim case is where
17 I really got to know her, for sure.

18 Q. And did you know she also represented Misty?

19 A. I -- I'm aware of that information. I do not
20 know when I became aware of that information. I don't
21 think I knew that at the time of the audit.

22 Q. Did you ever discuss with Misty Hampton her
23 bringing a whistleblower case of some kind?

24 A. Did I personally talk with her about?

25 Q. Right.

1 A. I don't believe so. I mean, that's not really my
2 field.

3 Q. I understand.

4 Do you know -- actually this is relevant to the
5 case, we're not just fishing -- do you know what legal
6 matter Misty was engaging Lambert for?

7 A. I don't know.

8 Q. Okay. Let's -- let's turn to Exhibit 5.

9 A. Okay.

10 Q. And have you seen this log before, in some form?

11 A. Yes, I have.

12 Q. And could you describe it for the record?

13 A. So it's -- I believe it's an export of the access
14 logs associated with ShareFile, which is the tool that
15 SullivanStrickler uses in order to securely make
16 forensic images available.

17 Q. And when were you given access to that ShareFile?

18 A. The first time I was given access to that was
19 when I was finally given permission to look at and work
20 on the Antrim data, which I don't remember the dates,
21 sometime in December.

22 Q. And so you -- you already had access to
23 SullivanStrickler's site before Coffee County; is that
24 right?

25 A. Correct.

1 Q. Okay. And then --

2 A. And just because I have access to the site
3 doesn't mean I have access to everything on it. But,
4 yes, that's I think why they gave you two logs: One
5 that showed what people had permission to, and one that
6 showed the download history.

7 Q. Okay. And so Page 1 of Exhibit 5 is what? Can
8 you tell?

9 A. It looks like it's access logs as to what someone
10 has access to.

11 Q. And the -- if you look at the right, the TRUE,
12 FALSE, TRUE, FALSE, is what they have access to do; is
13 that correct?

14 A. That's what it looks like to me.

15 Q. And does this -- does this log indicate when
16 different things were actually downloaded, or is that --
17 would that be a different log?

18 A. That's a different log.

19 Q. Okay.

20 A. That's why they gave you two sets of logs.

21 Q. All right. If you look at Page 1, a lot of these
22 people we have already talked about. But just quickly,
23 do you know who Scott is from ASOG?

24 A. Yeah, that's actually -- it looks like Todd.

25 Q. Oh, Todd, okay.

1 Okay. And for some reason he's also called
2 Scott?

3 A. My guess is he just didn't want his real name in
4 the logs.

5 Q. Okay. But that's -- that's Todd Sanders?

6 A. The email address t@[REDACTED] is Todd
7 Sanders' email address. And therefore my assumption is
8 that that is Todd Sanders. I have no direct knowledge
9 to know that. I mean, I have no direct knowledge to
10 know that Scott T., specifically beyond the email
11 address I recognize.

12 Q. Sure.

13 I'm just looking through here. Most of these we
14 know. I'm just trying to see if I have any more
15 questions for you on this.

16 A. Well, this version you have here is pretty
17 blacked out. So there's not a lot of people.

18 Q. Well, it's not as blacked out on the pages that
19 follow.

20 A. Okay.

21 Q. I will have to tell you, it's so blacked out it's
22 still printing on my printer, and I loaded it to print
23 this morning. Because any time you redact anything, the
24 printers don't like it. So -- because it's so much --
25 it's so big.

1 A. Yeah. I imagine you go through ink a little bit
2 faster that way.

3 Q. Yeah.

4 Who is Michal Pospiezalski,
5 P-O-S-P-I-E-Z-A-L-S-K-I?

6 A. Do you have a page number?

7 Q. Yeah. It's Page 9. Right in the middle.

8 A. Oh, Michal.

9 Q. And who is -- who is he or she?

10 A. He is an application security expert that -- man,
11 I didn't -- I didn't know he had any access to any of
12 this stuff. He is an application security expert. At
13 some point in time, someone sent his information to -- I
14 don't -- I don't know which party it was, whether it was
15 Lin Wood or Sidney Powell, and they asked me to vet him.
16 And I looked through his résumé, and he actually -- he
17 used to work for a company called Sigital (phonetic),
18 which is -- was one of the leading application security
19 companies that I also worked with. So, yeah.

20 Q. If you look at his permissions, there's -- it's
21 FALSE across the board. What does that mean?

22 A. Well, I mean, you got to go back to the top to
23 see what each row is. But if it's FALSE across the
24 board, then he couldn't do anything. But that's
25 probably not true. It's probably at least -- he could

1 probably just download. So it's probably -- the first
2 column's TRUE. So it looks like that was the first
3 column --

4 Q. That's right.

5 A. -- is download.

6 Q. And the other columns say FALSE, but that also
7 just means that they were FALSE at the time this
8 printout was generated, correct?

9 A. ShareFile should have a log of any of those
10 changes. My guess and expectation would be, though,
11 that most likely they never changed access for someone.
12 You know, they'd only do that if it requested, so -- but
13 ShareFile should track that information.

14 Q. And then do you know who John Basham is, right
15 above Michal P.?

16 A. I don't. I mean, I was working with Michal at
17 times. There is a high likelihood I was involved with
18 him somehow being part of this. But I have no
19 recollection of it whatsoever.

20 Q. Do you know where he is now?

21 A. I think he's part of a startup and he moved to
22 Miami, if I recall correctly.

23 Q. Do you know -- do you know his company name?

24 A. I don't recall, but the company he's involved in
25 is trying to create the next generation voting machine.

1 Q. If you go to Page 10, on the second visible line
2 is Patrick Colbeck?

3 A. Uh-huh.

4 Q. Who is he?

5 A. He's someone out of Michigan. I think he used to
6 be a politician there.

7 Q. Do you know what he's doing on this list?

8 A. No, sir.

9 Q. And just for the record, I sort of skipped over
10 this on this chart, but in I think it's the second
11 column, that's -- that's for the particular device or
12 folder.

13 Do you see that?

14 A. Yeah, hold on. I got to look at the beginning of
15 this. I'm not really familiar with these logs.

16 Yeah, it does. It says the path and then the
17 folder. So the second column is the folder. And so
18 they're saying their access was specifically limited.
19 You know, when they're saying that specifically, it is
20 limited to the thumb drives folder.

21 Q. And do you recall who issued you your credentials
22 to get on -- specifically to the Cotton County (sic)
23 folders?

24 A. I believe that Jim Penrose requested that
25 SullivanStrickler give me access. That -- that would at

1 least be the normal flow of things. But I don't -- I
2 don't know for sure. I just know the access was
3 granted.

4 Q. Did you -- did you always sign in under your own
5 name and credentials, or did you ever use someone else's
6 credentials?

7 A. I would never use someone else's credentials.
8 No. I always signed in under my credentials.

9 Q. Did you know that Ben Cotton would sign on using
10 Jim Penrose's credentials?

11 A. I understand that while he was waiting for his
12 own credentials, to expedite things, he logged in as
13 his -- that Jim provided him his credentials for him to
14 log in that time.

15 Q. Are you aware of anyone else logging in under
16 credentials that were not their own with --

17 A. No, sir. The only reason why I know that is
18 because I saw it come up in his deposition.

19 Q. Okay. Hang on just one second.

20 Sorry for the delay.

21 A. That's fine.

22 Q. I think my last -- I think I was interrupted here
23 before I could focus on your answer to my last question,
24 which was whether you're aware of anyone else getting --
25 using credentials that were not their own with respect

1 to Coffee County.

2 A. I'm not aware of anybody else using credentials
3 to access data besides their own, besides what you have
4 already specifically talked about with Ben.

5 Q. And do you -- do you recall -- do you recall who
6 you -- well, to go back to the cast vote records, the
7 JSON format, do you recall you actually doing that, or
8 is it simply looking at the Signal text messages?

9 Does that make any sense?

10 A. Yeah, I don't recall doing that. But I do
11 recall -- I do recall, like, in the -- in the user
12 interface, knowing how to create a cast vote record. So
13 obviously I had to do it at some point to figure it out.
14 So besides the text messages, I don't really remember
15 that, though.

16 Q. Had you ever heard that Mike Flynn or Roger Stone
17 had obtained various voting systems or copies of various
18 votes -- voting system images to make vulnerability
19 testing on them?

20 A. No, I am not familiar with any statements similar
21 along that -- those grounds. But I will say that
22 General Flynn was a part of the board of Defending the
23 Republic at one point in time. So it could be related
24 to this stuff that they're talking about.

25 Q. Do you know if Defending the Republic is still

1 engaged in collecting images of electronic voting
2 systems?

3 A. I don't know anything about that, no.

4 Q. Do you know what --

5 A. And I don't -- I would say that's kind of a
6 mischaracterization, they weren't like in the business
7 of doing that. So I don't know anything about their
8 involvement and what they're doing right now, besides
9 occasionally I see, you know, them put out various
10 things that comes across my social media feeds of sorts.
11 That's all I know about what they're doing right now.

12 Q. Did you or to your knowledge Mr. Lenberg return
13 to Coffee County after your initial visit on the 18th of
14 January?

15 A. I never returned to Coffee County. I do believe
16 that Jeff did. But don't you have surveillance footage
17 on that? I don't have any details.

18 Q. Yeah, we do. But do you know -- do you know --
19 based upon your recollection, do you know why he stayed
20 longer and you left?

21 A. As I recall, he said that he was going to
22 complete any of the work that needed to be done. And I
23 had a lot of things on my plate, so I didn't even really
24 follow up with it any further. So he was --

25 Q. But he was --

1 A. He was still trying to figure things out on the
2 ICC devices.

3 Q. So he was continuing the same work that you two
4 were doing; fair to say?

5 A. That is my understanding, but you'll have to ask
6 him.

7 Q. Did -- the security footage indicates -- I'll
8 just tell you, you don't have to believe me -- indicates
9 that a Secretary of State investigator actually came to
10 the elections office while Mr. Lenberg was there. Did
11 any -- do you recall that or did you hear about that?

12 A. I do believe I was told about that.

13 Q. And who told you?

14 A. I believe Jeff mentioned something to me.

15 Q. And what was -- what was his concern?

16 A. I don't recall.

17 Q. Okay. Did that change his plans or his
18 operations there in any way?

19 A. I'm not sure. You would have to ask him.

20 Q. Did you talk to anyone at SullivanStrickler
21 before you went to Coffee County to see if you needed to
22 follow up on anything they had done?

23 A. I mean, I don't recall doing so. But obviously
24 there was a message in the chat message, where I reached
25 out to Greg and asked him some questions. And that

1 happened, I believe -- you know, I think the date of
2 that message was when I was in Coffee County.

3 Q. I will get to that in a second.

4 For the record, did you ever hear that anybody --
5 anybody was paying Misty Hampton for her to get access
6 to anybody?

7 A. No. I have never heard anything even suggested.

8 Q. Were you required to sign any kind of
9 confidentiality agreement with respect to any of the
10 Coffee County data that you obtained?

11 A. I -- I believe -- I'm not sure, is the short
12 answer. I could not find any agreements that
13 specifically highlighted things in that. But I do
14 believe that -- like, for example, I know that I have a
15 confidentiality agreement with Stephanie Lambert. I
16 might have signed one with Defending the Republic at one
17 point in time. And, unfortunately, if I did, it was on
18 the email address that I don't have access to, and I
19 don't have a copy of it. But I'm not -- honestly not
20 possibly sure.

21 Q. This -- this visit was done under
22 Mr. Bundren's -- for Mr. Bundren, or your understanding
23 that he was the attorney involved in this one?

24 A. Yeah, he definitely did not have me sign
25 anything.

1 Q. Okay. Did you have any communications with a
2 gentleman from Coffee County named Ed Voyles?

3 A. Not that I know of.

4 Q. Did you have any communications with Eric Cheney
5 who was --

6 A. Not that -- yeah, not that I know of.

7 Q. I think I already asked you about Tony Rowell.
8 Do you recall having any communications with him?

9 A. Not that I know of. I'm sorry. I need to speak.

10 Q. Did -- did Ms. Hampton give you any indication or
11 did you have any understanding that any local attorneys
12 for Coffee County had given authorization for you and
13 Mr. Lenberg to be in the offices in the middle of
14 January of 2021?

15 A. I -- I'm not sure if I understand the nature of
16 your question. Why -- why would we need an attorney's
17 authorization to be in an office?

18 Q. You didn't -- you wouldn't need it. She might
19 have needed to give it to you, is what I'm getting at
20 it.

21 Is that you had an attorney, Bundren, who had
22 engaged you to -- or had a client who engaged you to do
23 this work, right?

24 A. (No audible response.)

25 Q. You need to say yes.

1 A. Yes.

2 Q. Okay. Misty Hampton worked for Coffee County.
3 Do you know if Coffee County had any legal advice with
4 respect to the propriety of letting you do that?

5 A. I -- I don't. I don't know. If the person
6 wasn't there, physically, I doubt I would remember,
7 quite frankly.

8 Q. Okay. Do you -- you never -- you never kept your
9 work in Coffee County a secret, did you?

10 A. I -- not sure if that's an -- I mean, it wasn't
11 trying to be a secret, as in anything wrong was done
12 there. But I was told that -- to -- that this -- that
13 they didn't want it talked about until whatever legal
14 action they had was in place. You know, so I -- I have
15 always -- if I ever referenced anything in Coffee
16 County, I refer to as, you know, I have done some work,
17 you know, at a county in Georgia, rather than
18 specifically naming it.

19 Q. So although it wasn't clandestine, it was work
20 that you kept confidential for purposes of your
21 engagement; fair to say?

22 A. Yeah. I mean, that's the professional thing to
23 do. If you're told not to talk about something until,
24 you know, legal action happens, you don't talk about
25 something until legal action happens.

1 Q. Did Mr. Bundren ever give you any sort of written
2 or specific instructions as to what you were looking for
3 or to do?

4 A. I had at least one call with him, and I think it
5 was three calls with him. But I do not recall anything
6 specific with it. I think the most specific thing I
7 have right now is the message from Jim Penrose and the
8 conversation where he says, you know, well, we're trying
9 to figure out whether we're going to do something with
10 this now or wait for something later on. Specifically,
11 so whether they're going to use it for something for
12 the -- I think it was for the run-off or not.

13 Q. Right.

14 A. So that's the most specific information I have at
15 this point that I remember.

16 Q. And you're referring to a Signal text message
17 that I think we'll get to in a second. Okay.

18 A. Correct.

19 And I have no recollection of that whatsoever
20 besides going through the messages, so...

21 Q. Right. What was Russell Ramsland's role in your
22 work in Georgia on the elections in Coffee County?

23 A. I don't recall him having involvement in Coffee
24 County, besides -- besides those messages that are later
25 on, when I was at the audit and he called me up. I

1 mean, you -- I'm sure we'll go through those messages.
2 But, you know, beyond that, I don't recall any
3 involvement. But it doesn't mean he wasn't -- wasn't
4 there or wasn't behind the scenes.

5 Todd and Conan did a lot of work for ASOG.
6 They're not employees for ASOG, but they were
7 contractors of them. And they were obviously engaged
8 based on everything that we have. And so he could have
9 been engaged at some level, and I either didn't know or
10 I don't remember.

11 Q. Okay. Was there anybody else present in the
12 Coffee County offices when you were there on the 18th
13 and 19th, besides you and Mr. Lenberg and Ms. Hampton?

14 A. Yeah, there -- there was two other people in the
15 office that worked for the office.

16 Q. Was one of them Jill?

17 A. I -- I couldn't tell you anymore. I'm sorry.

18 Q. That's okay.

19 Did you take any pictures of the components or
20 any of your activities there when you were there?

21 A. I don't believe I did.

22 Q. Do you know if Jeffrey Lenberg took any pictures
23 or videos?

24 A. I think he might have. You would have to ask
25 him.

1 Q. Okay. You know, one of the photos shows him with
2 I think a ring, like one of those rings that you use to
3 give better light for a video. Were you there when he
4 was doing that?

5 A. There was a ring?

6 Q. You know -- I don't know what you call them, but
7 the light ring that you use -- you've seen it now with
8 people using Zoom, to make a better --

9 A. Yeah. I don't recall that. I think I would.

10 Q. Did Ms. Hampton bring in a BMD for you all to
11 work on?

12 A. No, sir.

13 Q. Okay. And were you --

14 A. Not any time while I was there, at least.

15 Q. And were you able to work on the BMD software at
16 all?

17 A. No, sir. Until you told me that there was --
18 theoretically one of the thumb drives there was a copy
19 of an ADK file, I didn't even think that stuff had been
20 captured in Coffee.

21 Q. Okay. I want to dive a little bit in greater
22 detail, the tests that you did in Coffee County while
23 you were there.

24 Just sort of physically, can you walk me through
25 what you did, what you asked her to do, and what you did

1 while you were there?

2 A. Well, the idea was that if -- if -- if it's
3 rejecting a ballot based on the race of the candidate,
4 then that's something that should be reproducible. And
5 therefore, if you had -- you know, if you had ballots
6 from one candidate and the other candidate, you're going
7 to see different rejection rates that are noticeably
8 different between them if you feed through the machine.
9 That was the concept and the idea to prove if, you know,
10 Misty's theory was accurate.

11 So I forget the numbers, I think they're in the
12 report, but it was something like 10 or 20 of each
13 ballot -- each ballot type was repetitively fed through
14 a machine. And periodically those results were pulled
15 off of the card. You know, all that stuff was done by
16 Misty and the person helping her and compared against,
17 you know, what the printout was, making sure the
18 printouts were, you know, accurate, and it was, you
19 know, the right numbers, and that the rejection rates
20 were compared. It was pretty simple.

21 Q. What I'm going to do now is take a lunch break,
22 because I need to get some documents as exhibits, and I
23 don't want to waste any time. So if we could take a
24 45-minute break, and then I will get organized and we'll
25 be able to march through the rest of your deposition

1 quicker. Is that all right? So have some lunch and see
2 you a little bit before 1:00.

3 A. Sounds good.

4 Q. Thank you, sir. Appreciate it.

5 THE VIDEOGRAPHER: Off the record at 12:05 p.m.

6 (Whereupon, a break was taken from 12:05 p.m.
7 to 12:55 p.m.)

8 THE VIDEOGRAPHER: This begins Media Unit
9 Number 3. We're back on the record at 12:55 p.m.

10 BY MR. BROWN:

11 Q. Mr. Logan, this -- we're back on the record. I
12 would like to mark, I believe, as Exhibit 6, they'll
13 correct me if I'm wrong, Tab 15.

14 (Whereupon, Plaintiff Exhibit 6 was marked for
15 identification.)

16 BY MR. BROWN:

17 Q. And that may take a minute to appear. Let me
18 know when that comes up.

19 A. There we go.

20 Q. And I am not sure if the first part of that is
21 the same as what we have seen before, but if you would
22 scroll down to the twelfth page of that PDF.

23 A. Okay.

24 Q. And does this show the activity on that
25 particular folder that SullivanStrickler had?

1 A. Yeah, this looks like the download logs.

2 Q. Okay. And if you would scroll over to -- or
3 scroll down to, let's see, Page 15.

4 A. Okay.

5 Q. You'll see in the middle of the page that you are
6 uploading things to the site.

7 Do you see that?

8 A. Yes, sir.

9 Q. And what were you uploading?

10 A. So I had converted the forensic image into a
11 virtual machine, and I uploaded that result to the site.

12 Q. So you uploaded a virtual machine; is that what
13 that is?

14 A. Correct.

15 Q. And just for the record, tell me what that is and
16 how was that different than what -- from what you
17 downloaded?

18 A. So a forensic image, when it's captured, it's
19 captured in a manner that is immutable, you cannot
20 change it. And it's designed, you know, for that so
21 that you have the official record what the system looked
22 like if you were using it in a court case. But
23 converting it to a virtual machine allows you to
24 potentially, you know, boot up the device and be able to
25 utilize it like it was the computer in order to take a

1 look at the way the things operate, and more closely
2 examine it like it was a local system you were using.

3 Q. If you look on that same -- and so you did that,
4 it looks like, on January 16th; is that correct?

5 A. If that's what the log says, then that's correct.

6 Q. And then if you look at the bottom of that same
7 page, over to the next page, what is the reference to
8 fixed? What does that mean, in this third column?

9 A. So the first time I did the conversion, something
10 happened, and it seems to have taken out a bunch of
11 files, and it didn't actually function and work right.
12 I don't -- to this day, I don't really understand
13 exactly what was wrong. But I redid the process and
14 uploaded a version that actually functioned.

15 Q. So which part wasn't working, the virtual
16 machine?

17 A. The virtual machine had a lot of files missing
18 from it when it booted up, which that shouldn't have
19 happened. I don't really understand it. I've never
20 seen, you know, a partial conversion in such that
21 matter, but that's what had happened somehow.

22 Q. And were you ever able to determine the cause of
23 that issue?

24 A. I wasn't concerned with it. I mean, I just
25 assumed that something hadn't copied right.

1 Q. Right.

2 A. So, no, I just created a new version of it.

3 Q. And then a little bit further down, on Page 16,
4 it says upload ICC. And that's the central scanner; is
5 that right?

6 A. Yeah. There's a Windows machine that has an
7 off-the-shelf scanner plugged into it, which is what
8 makes up the ICC device with the software. And so that
9 is the Windows machine converted into a virtual machine.

10 Q. And then how do you -- you use a virtual machine,
11 in real life? I mean, what do you do with it?

12 A. You -- you, like -- what do you mean? Like, what
13 are the normal uses for it?

14 Q. Yeah.

15 A. Well, the normal use is in order to be able to
16 run multiple systems on a single machine, a single
17 computer, sharing the resources of that computer or, you
18 know -- or to do, you know, analysis for stuff like
19 this.

20 Q. And given your -- how did you personally use the
21 information that you got from the SullivanStrickler file
22 from Coffee County?

23 A. I didn't actually spend a lot -- I mean, it -- do
24 I remember well enough to answer this question?

25 Q. First, do you remember well enough to answer the

1 question?

2 A. So I -- I don't recall specifically how I used
3 the Coffee County stuff. I -- typically I would do
4 something like that in order to see how the applications
5 work and function. But I don't remember specifically in
6 Coffee County how far I made it or what I was doing
7 exactly in it. I know I took a look at the -- the
8 actual logs, Windows event logs. But I also could have
9 extracted those straight out of the forensic image for
10 that type of analysis.

11 Q. So some of the things you did you might have done
12 onsite or using the virtual machine that you had
13 downloaded, right?

14 A. No, sir. Some of that stuff, I could have done
15 via the forensic image that was downloaded or in the
16 converted format of the forensic image, you know, which
17 I uploaded. I'm not talking about anything on site.

18 Q. Thank you. I'm sorry. I misunderstood.
19 Appreciate that.

20 So give me an example -- so you can -- you can
21 test a system -- the way you would test a system and how
22 it functions would be using a virtual machine?

23 A. Correct. In a virtual machine you can actually
24 get software running, log into software, et cetera. You
25 know, so you can utilize it like it was a -- you know,

1 like it was a machine.

2 Q. If you turn the page -- I mean, the dates are the
3 dates. I'm not trying to trick you or anything. But it
4 looks like you might have uploaded -- this is on
5 Page 17. You might have uploaded the EMS on the 11th?

6 A. I don't know what page you're talking about.
7 It -- I mean, I'm not -- you said Page 17?

8 Q. Yeah. The page numbers should appear at the top,
9 but it's also -- might be the seventeenth page of the
10 PDF.

11 A. It looks like the -- no, I didn't upload
12 anything. That's administrator. Where are you seeing
13 me uploading something?

14 Q. If you look -- let me make sure we're on the same
15 page. Do you see the Bates Number at the bottom of the
16 page, small --

17 A. Yeah, I'm on Page 17. How many lines down are we
18 talking about?

19 Q. 15.

20 A. Okay. So are we talking about 1/11/21 at
21 9:41 a.m.?

22 Q. Yes.

23 A. I guess technically -- yeah, 9:37 a.m. Yeah.

24 Q. And then it looks like you deleted a file; is
25 that right?

1 A. Yeah. Because the version was -- was broken. I
2 deleted it and then I uploaded the fixed version.

3 Q. Okay. But this chart would show the earliest
4 date that you had access to it, right, if we just looked
5 at the dates?

6 A. If you looked at the dates, correct. And based
7 on looking on this -- this log, it looked like the first
8 time I downloaded something was on the 9th.

9 Q. Okay.

10 A. I haven't found it in this version of what you
11 have here. But as I recall, when I've looked at it in
12 the past, it said that.

13 Q. When did you first have access to the log file?

14 A. What do you mean the log file?

15 Q. Well, I mean, you didn't see this just today,
16 right?

17 A. No. When did I see that?

18 I don't know. It was when I was trying to
19 prepare for all of this stuff. I did research. I
20 wanted to find out what was out there. I think this was
21 actually attached as part of the case, a copy of this,
22 and I got it that way, but ...

23 Q. That's what I wanted to get, is if you got it
24 independent from this case to the best of your
25 recollection.

1 A. I believe I pulled it from the case, but I'm not
2 positive.

3 Q. Okay. Yeah, I'm not quibbling, but if you look
4 at the Page 18, it says, create folder, Doug Logan, just
5 beneath the black line.

6 A. Okay.

7 Q. Would that be the first time, or maybe or maybe
8 not?

9 A. I mean, as I recall, when I went through the
10 this, the first thing I did was download something,
11 which was on the 9th, if I remember correctly.

12 Q. Okay.

13 A. So that would have been earlier than the 10th.
14 But it looks like that the folder I created to upload
15 stuff was, you know, I -- because I didn't have upload
16 access initially. I believe I had to reach out to ask
17 for that.

18 Q. Okay. Who did you reach out to, to Penrose?

19 A. I probably talked with Greg, Greg Freemyer. And
20 I probably talked to both of them, honestly.

21 Q. Okay. I wanted to finish off with that exhibit,
22 because that was earlier than your personal visit to
23 Coffee County. But let me return to Coffee County, when
24 you were actually there in person.

25 A. Okay.

1 Q. Did you touch any of the equipment at Coffee
2 County?

3 A. No, sir.

4 Q. I take it you instructed or asked Ms. Hampton to
5 do so?

6 A. As I stated initially when you asked a very
7 similar question, she presented a problem she had, and
8 mostly Jeff came up with a way to test that. And then
9 the test was conducted, you know.

10 Q. Was there anything you asked -- you or
11 Mr. Lenberg asked her to do that she refused to do?

12 A. I -- nothing -- nothing comes to mind. But I
13 don't -- I don't believe there was clear instructions,
14 do A, B, C, D, E. The idea was -- you know, we -- to
15 rerun an election with predefined ballots to see what
16 the results are. She knew very well how to run an
17 election. We didn't have to give her any instructions
18 on that. She was the one who could instruct us on how
19 to do that effectively. She was doing advanced logic
20 and accuracy testing.

21 Q. Did you go into the small EMS server room when
22 you were there? They call it the Gems room.

23 A. I -- I know what you're talking about. And, yes,
24 I do believe I was in that room at one point in time.

25 Q. And was Ms. Hampton there with you when you were

1 there?

2 A. There was always someone with me whenever I was
3 around any of this equipment. I don't remember
4 specifically if it was her. It was probably her.

5 Q. Okay. So you mean -- just to follow up on
6 that -- somebody from Coffee County, either her or her
7 assistant, was with you at all times?

8 A. Correct.

9 Q. Did you -- did you have a Cellebrite kit when you
10 were there?

11 A. No, sir.

12 Q. I'm not going to quibble with you, but let me
13 just show you what we'll mark as Exhibit 7, Tab 10.

14 (Whereupon, Plaintiff Exhibit 7 was marked for
15 identification.)

16 BY MR. BROWN:

17 Q. And while it's coming up, what is a Cellebrite
18 kit used for?

19 A. I assume you're talking about a dongle to use the
20 Cellebrite software, and Cellebrite software is used for
21 capturing specifically mobile devices.

22 MS. MARKS: Bruce, could you say the tab number
23 one more time for me?

24 MR. BROWN: Tab 10.

25 MS. MARKS: Got it.

1 A. Okay. So Exhibit 7, Tab 10?

2 BY MR. BROWN:

3 Q. Yes, sir.

4 A. Okay.

5 Q. Is that you?

6 A. It looks like me.

7 Q. And what's that in your left hand, if you know?

8 A. I have absolutely no idea. Let's see if I can
9 zoom in.

10 Q. I think the next page is a little bit closer.

11 A. Back buttons changes exhibits. I want to go to
12 the next page.

13 I don't know what that is.

14 Q. Okay. It's not a Cellebrite kit?

15 A. Not that I know of. I would think I would
16 remember that.

17 Q. Did you --

18 A. What is that?

19 Q. It's on the second day that you were there,
20 January 19th, that morning.

21 A. Okay.

22 Q. But you just don't have any recollection of what
23 that would be?

24 A. No. I don't.

25 Q. And would you have any reason to have a kit that

1 copied mobile devices when you were there?

2 A. I can't think of any reason I would. I mean, I
3 know we talked with Jeff when we were first there that
4 we weren't going to touch any of the devices. And I
5 know that after my conversation with Greg, we had that
6 further conversation, just didn't think it was a good
7 idea. So I have no idea why I would be carrying
8 something in there --

9 Q. Okay.

10 A. -- you know, that was anything other than that.
11 I don't know what that is, though. I really don't --
12 have no idea.

13 Q. So you didn't attempt to copy any software,
14 firmware, or data when you were there, right?

15 A. No, sir.

16 But what on earth is that?

17 Q. Well, if it comes to you, let us know.

18 Let's go back to Exhibit 4, which is a list of
19 your Signal messages sorted by date.

20 A. Yes, sir.

21 Q. And specifically, if you could go to Page 6.

22 A. Yes, sir.

23 Q. Who is Jovan Hutton Pulitzer?

24 A. That is Jovan. Don't you know who Jovan is?
25 Everyone knows who Jovan is.

1 Q. What is his connection to Coffee County?

2 A. I had no recollection he had any involvement.

3 Based on just reading the stuff it sounds like he was
4 engaged by the attorney to look at the ballots, but...

5 Q. Is that his line of work?

6 A. That is currently his line of work, I would say.

7 Q. Looking at ballots, election things?

8 A. Correct.

9 Q. And he was at the Lin Wood plantation?

10 A. No.

11 Q. You didn't see him there or talk to him there?

12 A. I talked with him on the phone once there.

13 Q. What -- what was that about?

14 A. He was talking about his accomplishments, and he
15 was talking to a few other people that were on speaker
16 phone, and I was listening in on that conversation.

17 Q. What type of accomplishments?

18 A. All of his patents that he has filed.

19 Q. Anything specific relating to his findings about
20 elections or election security?

21 A. No. No. In fact, I've told him this as well,
22 but I thought he was one of the most arrogant people I'd
23 ever talked to. I really did -- did not like him when I
24 talked to him at that point in time.

25 Q. Was there another party or another occasion that

1 you saw him or ran into him?

2 A. Yeah. Yeah. Yeah. I talked with him in
3 association with the Arizona audit.

4 Q. Okay. And in these emails he says, "Who has the
5 Coffee County password for ballots?"

6 Do you see that? That's on Line 116?

7 A. Correct.

8 Q. And what is he talking about there, do you know?

9 A. My assumption is, because everything on the
10 ShareFile site had passwords associated with it, that he
11 did not have the password in order to decrypt ballot
12 stuff. But I really don't know anything about his
13 access or what he got.

14 Q. And did he have access -- to your knowledge, did
15 he have access to the SullivanStrickler site?

16 A. I do not know anything about that, whether he did
17 or didn't. All I have is what is in this message. I
18 honestly -- I didn't -- I didn't think he had any
19 association with Coffee County until I saw this in my
20 messages.

21 Q. You reached out to Greg Freemyer on the 18th.

22 Do you see that?

23 A. Yes, sir. I knew you'd ask me about this one.

24 Q. So tell me about reaching out to Greg Freemyer.

25 A. I -- I don't remember this really much at all. I

1 do know that I was disappointed that they hadn't been
2 able to capture the ICP device, and I was researching
3 how that would be done, and I was reading a DEFCON
4 report associated with it. And so I had reached out to
5 him just to ask some questions. And I think based on
6 that conversation, on what was necessary in order to do
7 things properly, and talking with Jeff, we were like,
8 no, we definitely -- that's a really bad idea. We're
9 not going to -- not even going to try anything like
10 that, so...

11 Q. Not going to try anything like what?

12 A. We're not trying to capture any type of forensic
13 stuff. We thought it was better to stick to the plan to
14 not touch anything and just leave that to --to really
15 what the experts are. Because I'm not a forensics
16 person. If their -- if we had captured anything at that
17 time or touched anything at that time, it would be very
18 difficult to defend any of that in court, because it's
19 not my expertise, it's not my background, it's not my
20 certifications. And we didn't want to jeopardize any
21 potential legal stuff in there. So the idea was to
22 never touch or do anything with it, even if it hadn't
23 been captured because, you know, it was too big of a
24 risk to even consider something like that.

25 Q. And I'm going to come back to this exchange.

1 But did anything come of the work that you did in
2 Coffee County in terms of support for a lawsuit or any
3 kind of action?

4 A. So when -- when I left Coffee County, and Jeff
5 said he was going to finish things up, my assumption
6 would be that all follow-up was in there. I got very
7 busy with planning the Arizona audit after that and I
8 didn't get back to it.

9 Q. So to your knowledge -- well, but you haven't --
10 have you seen it used anywhere in any litigation or
11 any --

12 A. I have not seen it used in any litigation
13 anywhere, no.

14 Q. Or any sort of public forum or anything like
15 that?

16 A. If I thought I had any legitimate claim to
17 attorney work product, I would be using that today. But
18 after it was clear that Mr. Bundren didn't intervene on
19 this stuff, I don't -- I don't feel like I have that --
20 you know, that privilege. That's why I'm answering all
21 of these questions. You know, otherwise --

22 Q. Right --

23 A. Yeah.

24 Q. But, I mean -- I'm not -- I'm not parsing words.
25 I'm just trying to figure out, you did -- you and Jeff

1 Lenberg did this work in Coffee County?

2 A. Correct.

3 Q. And then how was that work used by you or Jeff or
4 anybody else to your knowledge?

5 A. It -- it wasn't used. The goal was to do work
6 for attorneys, and they're the ones that have to do
7 something with it. As an expert, you don't go out and
8 use your own stuff. You provide it to the attorneys who
9 use it for their work. So I can't tell you. You have
10 to ask the Charles Bundren as to why it was never used
11 for something.

12 Q. But you give your report to Mr. Bundren, correct?

13 A. Correct.

14 Q. And gave --

15 A. I believe I gave to Jim who gave it to
16 Mr. Bundren. But, yes.

17 Q. And did Mr. Lenberg give his own report?

18 A. He did.

19 Q. And that's -- from your perspective, that's the
20 last you heard of it, I guess, right?

21 A. Yeah, until I got that -- that Phil or Russell
22 reaching out to me, which I'm sure you said we're going
23 to talk about later. So whenever we jump to that.

24 Q. Yeah. I think we'll get to that.

25 But going down here, you say on the 19th, "Hey

1 Greg, I'm onsite at Coffee. I think I figured out how
2 to access the" -- and then it doesn't --

3 A. You need to go back to my -- the actual exhibits
4 I gave you. It's not cut off in what I gave you.

5 Q. Okay. Fair enough. I will. I don't want to
6 waste your time with that.

7 A. Because I explained -- I think even then I talked
8 about the DEFCON report, you know, what I've already
9 said to you right now is actually in the real messages
10 and what I provided you.

11 Q. Yeah. Let's go to Exhibit 3.

12 And if my notes are correct, it should be on
13 Page 4, toward the bottom.

14 A. Yep.

15 Q. I'm glad you pointed that out, Mr. Logan. The
16 message actually says, "Hey Greg, I'm onsite at Coffee.
17 I think I've figured out how to access the CompactFlash
18 of the ICP devices to get an image of the OS."

19 A. Yeah. And that was based on looking at the
20 DEFCON report, which I send to him later on in that
21 communications thread. It was not based on any
22 knowledge I even did in the office. It was just in
23 continued reading that I found in the DEFCON stuff.

24 As I recall, actually, the DEFCON report was an
25 older version of the ICP anyway. So it wasn't even the

1 same thing.

2 Q. And what is the ICP?

3 A. ImageCast Precinct. It's the thing that looks
4 like a giant trash can or shredder that at a precinct
5 someone feeds stuff into. And for the record, you would
6 never use Cellebrite on it.

7 Q. On something like that, right?

8 A. No. My Cellebrite is specific to iOS or Android.
9 And so it would be applicable if you're talking about
10 election equipment, it would be applicable to the poll
11 pads, or it would be applicable to the BMDs, both of
12 which had already been imaged. So it wouldn't make any
13 sense for me to walk in there with a Cellebrite.

14 Q. Okay.

15 A. And I really want to know what it is, though.

16 Q. I understand.

17 Let's go to -- on Exhibit 4, Page 12, because I
18 want to make sure that I have the whole message.

19 A. Okay. Exhibit 4, if the page number on the
20 bottom corner is right, it goes only up to Page 10.

21 Am I looking in the right spot --

22 MS. MARKS: I just got -- this is Marilyn
23 Marks. I just got a message from Bruce saying that
24 he lost power in his office. So maybe we can go off
25 the record, Court Reporter and Mr. Videographer,

1 until Bruce recovers?

2 THE VIDEOGRAPHER: Yeah. No problem. I was
3 looking at that.

4 Off the record at 1:22 p.m.

5 (Whereupon, a break was taken from 1:22 p.m. to
6 1:28 p.m.)

7 THE VIDEOGRAPHER: All right. Back on the
8 record at 1:28 p.m.

9 BY MR. BROWN:

10 Q. Mr. Logan, we were talking about your Signal
11 messages on Exhibit 4. And if you look at the --
12 there's a thread name that's called Special_Report.

13 Do you see that?

14 A. Yeah.

15 Q. And what was the Special_Report?

16 A. That's the report that you have a copy of.

17 Q. That's the report that you were in the process of
18 preparing, correct?

19 A. Correct.

20 Q. And Mr. Penrose says to you, or to the others --
21 well, who was in the -- who was in the group for the
22 special report?

23 A. I'm not sure offhand. I believe -- I know that
24 it's obviously Jeff, myself, and Jim. I think those
25 were the only people, but I'm not positive.

1 Q. Okay. And it says, "Here's the plan. Let's keep
2 this close hold," I guess?

3 A. Okay.

4 Q. And then if you look at the entry at 13:18,
5 Mr. Penrose says, "If you can draft a report for review
6 on Friday morning with Charles Bundren, that would be
7 best. We only have until Saturday to decide if we're
8 going to use this report to try to decertify the Senate
9 run-off election, or if we hold it for a bigger movement
10 later."

11 Do you see that?

12 A. Yes, sir.

13 Q. Do you recall how your report would have been
14 used to decertify the Senate run-off election?

15 A. I don't think I ever knew that. So, no, I have
16 no idea.

17 Q. Was part of the -- was one of the purposes of --
18 of your being down there to get evidence to certify --
19 to decertify the Senate run-off election?

20 A. I don't recall that -- that being discussed at
21 any point in time. But as I said, in all of these
22 messages, I don't --

23 Q. I mean, was it possible that -- that your work
24 was going to be used for purposes that you did not
25 intend it to be used for or that you didn't know the

1 purpose of what you were doing?

2 A. I mean, that's always a possibility.

3 Q. But you didn't -- when you were down there -- or
4 before you went down there, the instructions weren't --
5 weren't something, like, look, there's a Senate run-off,
6 we've got to get evidence to decertify quickly?

7 A. No, absolutely not. It was, hey, Jeff is working
8 on something in Coffee County; can you meet with him?
9 It was really pretty light.

10 Q. The line here, though, is or "we hold it for a
11 bigger movement later."

12 Do you know what that is referring to?

13 A. I would -- I would assume a lawsuit, but I don't
14 know.

15 Q. Did you talk about other purposes of this
16 information, like for a -- specifically for a lawsuit or
17 some sort of challenge of any kind?

18 A. It was always my understanding this step was
19 being utilized as part of litigation, so...

20 Q. Do you --

21 A. I don't know -- I don't know what else to say. I
22 don't have a very clear memory of every conversation I
23 had. Like I've said, most of these messages, you know,
24 I'm reading them, but I'm not even remembering that they
25 happened, you know, type of thing.

1 Q. No, I under --

2 A. So I don't know how I can give any more
3 additional context than that.

4 Q. I appreciate that.

5 Then on -- a minute later he says, "I'm not going
6 to brief Sidney on these findings yet."

7 Do you see that?

8 A. Yes, sir.

9 Q. And that -- and that would have been Sidney
10 Powell?

11 A. That would be my understanding.

12 But I -- I was surprised by that because when
13 I -- when the audit happened and I reached out to Greg
14 and asked him, I was like who even signed the contract?
15 I remember being very surprised that it was Defending
16 the Republic. So any involvement she had was minimal in
17 this, at best. So I don't know if I knew or didn't know
18 she was involved in this at that time, obviously. I
19 must have known based on that message, but I don't
20 recall that.

21 Q. Okay. If you go down, this is still on
22 Special_Report, but it's one -- January 20th at 18:11.

23 A. Okay.

24 Q. Do you see where you say, "Also I'm making a
25 revisit plan to really nail all of this down"?

1 Do you see that?

2 A. That's where Jeff says that?

3 Q. Yes, sir.

4 A. Okay.

5 Q. And that's referring to, as far as you can tell,
6 him revisiting and continuing to work on it?

7 A. That's my understanding.

8 Q. If you skip down to Page 13, Line 12.

9 A. Do you really mean Page 13 -- oh, I see what
10 you're doing, you're using the lines on the inside.

11 Q. Yeah.

12 A. Okay.

13 Q. Yeah, I'm still on the real one that you gave,
14 not my incomplete selection.

15 A. Okay. Well, you told me to look at Exhibit 4,
16 which is the other one. So I'm looking at the other
17 one.

18 Q. I'm sorry.

19 A. You're fine.

20 Q. Okay.

21 A. So, yeah -- so, yes, I see what you're talking
22 about: "Here is a version of the ICP analysis with my
23 suggested edits." Yeah.

24 Q. Right. So you and Mr. Lenberg are working on
25 the -- on the ICC analysis report together, correct?

1 A. He reviewed my ICP analysis report. I do not
2 believe I worked on the ICC analysis report. That was
3 just him.

4 Q. Okay. So you did an ICP report, and he did an
5 ICC analysis, correct?

6 A. Correct.

7 Q. Okay. If you -- we'll look at January 24 -- this
8 is actually easier on Page -- on Exhibit 4, but feel
9 free to go to Exhibit 3. Go to -- go to Exhibit 3,
10 Page 5.

11 A. Okay.

12 Q. Mr. Freemyer says, "Doug, I have finally run a
13 series of triage reports on the three computers imaged
14 at Coffee County."

15 Do you see that?

16 A. Yep.

17 Q. And what is he -- what is he referring to?

18 A. He took the forensic images and he ran them
19 through a tool in order to see, if I recall correctly,
20 whether USB devices had been plugged in, and what USB
21 devices and when had been plugged in.

22 Q. And do you recall any findings from that
23 analysis?

24 A. I don't recall anything significant. I mean, I
25 don't recall anything, an issue with his findings,

1 period, which probably means there was not something
2 significant.

3 Q. Do you know -- there's a reference in here by
4 Misty on the February 17th. It's Line 166 on Exhibit 4.

5 A. You just put me back in Exhibit 3.

6 Q. Yeah.

7 A. What page on Exhibit 3?

8 Q. On -- on Exhibit 3, it's Page 3, Line 2.

9 A. Okay. Okay.

10 Q. And she says, "How to" -- it says a question
11 about how to program these security key fob.

12 Do you recall what that was about?

13 A. I'm just trying to read the context and see if
14 it...

15 Q. And watch out for the date, because this is
16 February.

17 A. No, I don't remember that at all. I don't know
18 what she's talking about.

19 Q. Do you recall why you were communicating with
20 Misty Martin in February, a couple of weeks after you
21 left?

22 A. I mean, I probably had follow-up questions
23 related to when I poked at the forensic images stuff.
24 That would be my guess, but that's pure speculation.

25 Q. If you look at Page 3, Line 7. There's a message

1 from Conan Hayes, I think, at 11:21.

2 A. Yep.

3 Q. And he says, "What's up buddy!?! Can you please
4 send me the passwords for Coffee County?"

5 Do you see that?

6 A. Yep.

7 Q. What passwords is he trying to get from you?

8 A. I think as you can tell from the conversation, I
9 wasn't very clear what passwords he was trying to get.

10 Q. You say login or decrypt, right?

11 A. Yeah. Is he asking for the credentials to log
12 into the Windows machine? Is he asking for the
13 credentials to decrypt the files, because all of them
14 were actually encrypted on the ShareFile site? You
15 know, were -- were they the password to the virtual
16 machine I created, or was it the forensic data collected
17 by SullivanStrickler? Like, what password do you need?

18 Q. Did you give him any passwords?

19 A. I believe in that thread, I sent some over, and
20 he said, hey, those are the ones he they already had.
21 But I'm going off of the messages. I don't really
22 remember this conversation. So I'm only going by what I
23 read, which is the same thing you read. I certainly
24 knew that he had access to those systems and had been
25 authorized, so I would not have thought anything giving

1 him credentials.

2 Q. Okay. Just one second.

3 THE VIDEOGRAPHER: Mr. Logan, in the meanwhile,
4 is there like a lamp or something you can put on in
5 front of you? You're getting a little bit dark.

6 Not behind you, in front of you.

7 THE WITNESS: I mean, I can change the aim of
8 this -- no, I can't change it.

9 THE VIDEOGRAPHER: Okay.

10 THE WITNESS: Is that any better?

11 THE VIDEOGRAPHER: I mean, that's fine. That's
12 fine. Just wondered if we can get a little more
13 light. You're good.

14 THE WITNESS: Sorry. For this I ended up at a
15 hotel room. I don't have a lot of flexibility from a
16 lighting standpoint, so...

17 THE VIDEOGRAPHER: Thanks for trying. All
18 right.

19 THE WITNESS: If I was at my house, you know, I
20 would have more flexibility. But then my power
21 probably would have gone out a couple of times.

22 MR. BROWN: No, I'm -- I'm in my office, I have
23 no excuse. I just have better lighting when my
24 laptop is out of AC range, and so I have to switch --
25 my laptop finally expired on me. So I had to move.

1 As you can tell, I had to move my location.

2 BY MR. BROWN:

3 Q. Did you -- I know that you prepared the report
4 for your attorney, Mr. Bundren. Did you give any report
5 on your findings to Misty Hampton or anybody associated
6 with Coffee County?

7 A. I don't believe we ever got a copy of the report.
8 But Misty is the one who did the work. I just
9 documented it, you know. So, I mean, people in our
10 office did the work. So, no, I mean, there wasn't any
11 need. They knew exactly what had been done. They did
12 it, you know.

13 Q. But in terms of any findings that you -- any
14 findings that you made, did you deliver those to Misty
15 or did she have any -- I mean, what did they do with the
16 information -- we talked about the fact that Bundren
17 never did -- to your knowledge, never did anything with
18 the information that you produced, right, to your
19 knowledge?

20 Did Coffee County, to your knowledge, do
21 anything, either Misty, or the board, or anybody
22 associated with Coffee County?

23 A. I -- I mean, I -- I never talked with anyone in
24 Coffee County, besides Misty. And I think after --
25 after I left, besides those messages you see, I didn't

1 have much communication with Misty. In fact, I'm not
2 sure if there was much of any communication.

3 So, no, to the best of my knowledge, besides the
4 stuff that she was a part of in doing -- and I think I
5 mentioned this, but I didn't do a lot of analysis in
6 Coffee County. I did enough analysis to -- to see that
7 they were similar and some initial poking around, but
8 nothing extensive. So there wasn't like this long list
9 of findings that needed to be communicated with her. In
10 any case, if I had findings like that, I would
11 communicate it with an attorney, I wouldn't go directly
12 to the person. I would leave it to the attorney to
13 communicate it with them.

14 Q. Got it.

15 Let me direct your attention to -- on Exhibit 4,
16 if you would scroll down to your discussion with Greg
17 Freemyer. It's on Line 196 on Exhibit 4.

18 A. Oh, I actually -- I've got Exhibit 3 open, but
19 I'm in the Greg Freemyer conversation. What do you want
20 to look at?

21 Q. It's on Page 6 of Exhibit 3.

22 The -- if you sort of pull back a little bit,
23 Mr. Logan, this is a good three months after
24 SullivanStrickler went to Coffee County. A little bit
25 less than that when you went. Do you recall the

1 occasion for SullivanStrickler being interested again in
2 what you had done in Coffee County and how that arose?

3 A. I was talking with them about something else, if
4 I recall correctly, but it wasn't relevant to any of the
5 subpoena data.

6 Q. About another project that you were working on
7 with them?

8 A. I -- I don't recall offhand the specifics on
9 exactly what it was.

10 Q. And then you corrected their labeling of the ICP,
11 correct?

12 A. I mentioned that to them, so they would know
13 that, correct, yes.

14 Q. Right. And then couple of lines down, at 22:01,
15 you say, "We just haven't figured out how to image it
16 yet."

17 Do you see that?

18 A. Yeah.

19 Q. Why are you still concerned with that, if you
20 were, at that late date?

21 A. Because I was about to start the audit in Arizona
22 that had very similar equipment, and I wanted to be able
23 to capture images of ICP devices.

24 Q. So you were using the data that you captured from
25 Coffee County to assist in your analysis of the system

1 in Arizona?

2 A. That's not what I said.

3 Q. That's a new question.

4 A. I -- I don't recall any of the specifics about --
5 in here. But that's -- would definitely be why I was
6 concerned on, what was that, April 12th, which the --
7 the audit I believe started -- we arrived on site around
8 April 19th, if I remember correctly. So I would have
9 been very concerned with how to capture forensic images
10 of ICP devices to capture and do analyses and plans.

11 Q. If you go down, you tell Mr. Lenberg -- this is
12 in the Jeff Lenberg thread -- "Talk to Jim to get
13 Charle's (sic) approval."

14 Who -- that's Penrose, I guess. And who is
15 Charlie? Or Charles?

16 A. If it's Charles, it's probably Charles Bundren.
17 But, I'm sorry, where are you?

18 Q. It's -- on Exhibit 4, it's Line 204.

19 A. I'm still on Exhibit 3.

20 Q. Then it's on Page 9, Line 16.

21 A. Yeah. I mean, that would be Charles Bundren
22 if --

23 Q. Okay.

24 A. -- it's Coffee County. Yeah.

25 Q. If you look at the June 11, 2021, entry, so with

1 Todd Sanders.

2 A. Uh-huh.

3 Q. And I'm trying to figure out who it's from and
4 who it's to. You emailed him: "Do you know who CJames
5 is on telegram?"

6 Do you see that?

7 A. Correct.

8 Q. He says, "No."

9 What was your question or your concern at that
10 time?

11 A. Well, at that point in time, someone had
12 mentioned to me that they had a copy of the Coffee
13 County VM. And that really concerned me, because that
14 stuff should not be circulating anywhere. And I -- I
15 asked them where they got it, and they said they got it
16 from CJames on Telegram.

17 Q. And did you figure out who he was?

18 A. Yes.

19 Q. Who was he?

20 A. Conan Hayes.

21 Q. So he was using a pseudonym on Telegram?

22 A. I mean, I think his middle name is James. So
23 CJames is Conan James Hayes, so...

24 Q. And so he had authorization from Penrose to
25 access the -- that data anyway, correct?

1 A. Correct. I mean, I believe it was actually
2 authorized from Charles Bundren directly, quite frankly,
3 but I don't -- I don't know if I had visibility into
4 that, if I ever knew that.

5 Q. Okay. If you could go down to -- there's an
6 entry from Phil Waldron, September 22nd, 2021. It's on
7 Line 239, on Exhibit 4; Page 12, Line 12 on Exhibit 3.

8 A. Yep.

9 Q. And so you were in communication with Phil
10 Waldron from time to time, then?

11 A. Correct.

12 Q. What about?

13 A. Various, different things. Different things
14 going on with Election Integrity efforts. He would talk
15 to me at times. He -- I mean, he introduced me to a
16 couple of people in Arizona when I was out there for the
17 audit as well, so...

18 Q. And then he says on September 22nd, there's two
19 question marks, but "Misty from Coffee County is getting
20 hammered like Tina in Mesa County."

21 Do you see that?

22 A. Uh-huh.

23 Q. And do you recall what he was referring to?

24 A. I don't know what he was talking about to this
25 day, but he said that somehow Misty was in trouble, and

1 I still don't know what that was about. And he said he
2 needed an image. I told him I wasn't giving it to him.

3 Q. And did he get it from somebody else?

4 A. I don't know. I think actually what he had me do
5 is call Russ, which is why you see the message, "I heard
6 you need to talk with me."

7 Q. And did you --

8 A. I mean, you've seen when you follow these, I
9 mean, there's a conversation with Greg, where when I
10 talked with Russ, he basically threatened me that I was
11 going to be blowing -- holding some lawsuits if I didn't
12 give him the data. And I told him, no, I'm not going to
13 just give data to a random person because they asked me.
14 That's not what you do with data.

15 Q. So Ramsland -- Ramsland was threatening you with
16 a lawsuit if you didn't give them the data; is that
17 right?

18 A. I -- that's not -- that's not completely
19 accurate. He was saying that things were blowing up for
20 Misty and I was going to be pulled into it. But it was
21 not -- it's not really in the most friendly tone or
22 friendly way, as I recall.

23 Q. Well, how would you get pulled into it?

24 A. I have no idea. He was trying to -- I don't
25 know.

1 Q. I mean, what -- what possible trouble could Misty
2 Hampton been in, in September of 2021, do you know?

3 A. I have absolutely no idea. I don't even know if
4 this is -- if that was real or if they were just trying
5 to get at the data. I can't tell you. All I can tell
6 you is I didn't give them the data, and they requested
7 it.

8 Q. Do you know if they got it from somebody else?

9 A. I do not know.

10 MR. BROWN: Okay. Let me mark as the next
11 exhibit, Tab 11. And that's going to be Exhibit 8.

12 (Whereupon, Plaintiff Exhibit 8 was marked for
13 identification.)

14 A. Okay.

15 BY MR. BROWN:

16 Q. Have you recently reviewed these emails?

17 A. I don't think so.

18 Q. Do you recall being in the loop in -- in January
19 with Sidney Powell and Paul Maggio and others relating
20 to the Coffee County collection?

21 A. I am aware that email address I had was
22 apparently copied on those messages. I have no
23 recollection of ever reading those messages. And I
24 believe that I did not.

25 Q. I'm not -- I'm not questioning you.

1 But why would you be put on there in the email
2 address as a CC if you -- if you weren't really getting
3 these messages? Do you follow me?

4 A. Because as I mentioned, from November through
5 December, I was working closely with Jim and others on
6 things. And I was involved. But after I stopped and
7 worked for -- for Lin Wood, I stopped checking that
8 email address on a regular basis. And certainly after,
9 you know -- if I -- I mean, I don't know about you,
10 maybe you're one of those people that reads every
11 message no matter what. But if I found out that I'd
12 received a whole bunch of emails for something that
13 already happened, I wouldn't go back and read them, you
14 know.

15 Q. And in fairness, this is -- these are emails from
16 Sidney Powell, who is not actually in -- you know, it's
17 not like getting an email, for example, from MyPillow or
18 something other junk mail you might get, just to pick a
19 name out of the blue.

20 I mean, you're saying you didn't -- that if you
21 got an email from Sidney Powell, you just sort of blew
22 it off?

23 A. I'm saying that if there was a thread associated
24 with Coffee County in some way, and a forensic
25 acquisition already happened, and I found out about it

1 after the fact, no, I wouldn't go back and read that. I
2 mean, I -- I --

3 Q. Wait, wait -- don't ask -- don't answer until I
4 ask you a question, be careful, because we have a
5 document here, you need to review it before talking
6 about what you remember or don't remember. So please be
7 cautious.

8 If you scroll down, you'll see that on
9 December 21st -- and this might give you some more
10 context, okay. Scroll down to the second page of
11 Exhibit --

12 A. Okay. I'm looking at something that starts with
13 Rule 183-1-12.01, securing voting system components. Is
14 that what you're intending to be the exhibit?

15 MS. MARKS: Excuse me, Bruce, that is because I
16 uploaded Tab 8. But now he should have Exhibit 8,
17 Tab 11.

18 MR. BROWN: Okay.

19 MS. MARKS: Sorry.

20 MR. BROWN: That's all right.

21 BY MR. BROWN:

22 Q. Yeah, you need -- I'm sorry, you need to -- we'll
23 sort of restart on this because we were looking at
24 different documents. Tab 11 is Exhibit 8. And I need
25 for you to focus on that string of emails.

1 A. Okay. And what about the string of emails? Do
2 you want me to read the whole string, or what do you
3 want me to do?

4 Q. No. I mean, listen, I know it's been a couple --
5 you know, a couple years. But the testimony that we had
6 before was you were with the Lin Wood people on their
7 plantation to the end of December, stop, and then the
8 next contact you had was, let's go to Coffee County in
9 mid January. And I asked you about what you knew about
10 the Coffee County collection by SullivanStrickler in
11 early January, and you couldn't recall anything.

12 So I'm trying to see if that is still your
13 recollection, that you were not involved in -- in that.

14 A. I wasn't involved in it. And let me -- I mean, I
15 know depositions, you're not supposed to just provide
16 other information. But I can give you context how I
17 know that I didn't read these email messages and how I
18 know I didn't receive it. Because on --

19 Q. That's helpful.

20 A. -- on January 6th, I had stayed up all night to
21 put together an information sheet called election facts
22 and figures, trying to aggregate information that I put
23 together with core information, like SEC filings and so
24 forth that supported it for every last little thing, in
25 order to be sent to someone who said they would give it

1 to the Senators so they could enter it into the
2 congressional record when they went through to certify
3 the vote.

4 Being up all night long, I was extremely tired.
5 And at that point in time when I was front of my
6 computer, the mouse moved on its own. And when I went
7 to move it back over, I freaked out and I see my
8 computer was compromised, and I shut it down.

9 Later on that day I went to sleep, you know, I
10 was sleep for several hours, and then I came back and
11 found all the craziness about January 6th.

12 But meanwhile, I was thinking about what I wanted
13 to do with my machine, and I didn't have my new machine
14 up and running until I formatted the system, which is
15 why I formatted it and rebuilt the entire system. It
16 didn't have the Signal messages passed.

17 So I know for a fact that it didn't have any
18 messages on those systems. All the emails were not
19 coming to my cell phone. I didn't -- wasn't even using
20 my cell phone for several days in there. So I had no
21 way to receive those message.

22 So I know I didn't receive these messages, and I
23 know I didn't read them, because I didn't have any
24 operational system on it, which is why I was surprised
25 when Jim gave me a phone call.

1 Q. I'm just -- I'm looking through the rest of these
2 emails to see if -- what impact that has on my
3 questions.

4 A. Now, is it possible I could have at some point
5 come back and read them? But really, like I was so
6 inundated trying to keep my company running and do all
7 this extra stuff, that I wasn't going back to read
8 emails for something that already happened. Like, I
9 just wouldn't do that.

10 Q. Right. But, I mean, it -- forget about the
11 emails for a second.

12 But it's your testimony that you were not
13 involved in the -- in the planning to send
14 SullivanStrickler to Georgia in January -- on
15 January the 7th, correct?

16 A. Correct. And I can't imagine that I'd have any
17 type of serious memory stuff enough to get that wrong.
18 But I have been surprised at what I haven't remembered
19 here. But as I told you, what I explained would explain
20 exactly why I didn't have -- didn't have any of that
21 stuff, and I wasn't involved in it.

22 Q. Let me direct your -- I'm with you. I'm going to
23 move on -- this is not in response to what you just
24 said, but I need to ask you another question about this
25 exhibit.

1 A. Okay.

2 Q. Now I lost it. Hang on. It wasn't a -- hang on
3 just one second.

4 Do you know Brendan Sullivan?

5 A. That name sounds really familiar.

6 Q. He's the -- he's the Sullivan in
7 SullivanStrickler.

8 A. I'm -- I don't think I talked with him then.

9 Q. Okay.

10 A. I mean, mostly, I talked with Greg Freemyer. I
11 occasionally talked with Paul. And I think there was a
12 Jennifer. I think those are the main people I ever,
13 ever talked with over at SullivanStrickler.

14 Q. Okay. If you go back to the first page of
15 Exhibit 8.

16 A. Okay.

17 Q. There's an email address there is
18 magnolia64@[REDACTED]?

19 A. I have no idea. I'm sorry.

20 Q. That's -- we believe that's Scott Hall's email
21 address. And does that -- do you recall his involvement
22 in this collection?

23 A. I never interfaced with him as best I know on any
24 of this stuff with this collection. So I don't -- I
25 can't really talk about that.

1 Q. Okay.

2 A. I mean, you guys have talked with a lot of
3 people. I would think that someone would have
4 contradicted the story if I was wrong.

5 Q. SullivanStrickler said you were. But they --
6 it -- I don't want to, you know...

7 A. I mean, when -- they were engaged before, and I
8 was often part of that contact. You know, so that's the
9 only thing I can think of, maybe they were confused.

10 Q. But you were involved in the engagement of
11 SullivanStrickler generally, but not with respect to the
12 specific January 7 capture; is that fair to say?

13 A. Correct. If you asked SullivanStrickler who ran
14 things on our end -- you know, on this end of things,
15 they would probably say Jim and Doug.

16 Now, in reality, Jim probably functioned, you
17 know, like you'd say a manager. He was the one who had
18 all the interfacing conversations with more people than
19 I did.

20 Q. Upper management?

21 A. Yeah. A lot of times he would be the one who
22 would talk to the attorneys, and, you know, I wouldn't
23 have those direct conversations.

24 Q. I just need to ask some things. Okay. Bear with
25 me.

1 Did you or anyone else to your knowledge try to
2 reverse engineer any of the software or firmware taken
3 or copied from Coffee County?

4 A. To the best of my knowledge, no, for Coffee
5 County.

6 Q. With respect to other jurisdictions?

7 A. Please define "reverse engineer."

8 Q. Well, what do you -- how do you use that term?

9 A. I don't generally use that term.

10 Q. Did you -- well, reverse engineer, meaning to
11 figure out how it worked by -- well, how -- just tell me
12 how -- what you -- I mean, I know you don't like the
13 term, but how do you understand it to be?

14 A. So reverse engineer -- reverse engineer gets
15 complicated on the DMCA, because it's viewed as a way to
16 try to get competitive intelligence under software in
17 order to compete with it in some manner.

18 So did I try to figure out the way the software
19 functioned and worked to see if there was problems that
20 were exploited by someone? Yes, I did.

21 Would I ever call that reverse engineering? No.

22 Could someone call it reverse engineering?
23 Possibly.

24 Q. Okay. Have you heard of any reaction by Dominion
25 to learning that their software had been copied in

1 Coffee County, or anywhere else?

2 A. No, sir.

3 Q. Did you ever get any contact made with you,
4 directly or indirectly, from Dominion about any
5 copyright issues or any sort of trade issues, with
6 respect to their intellectual property?

7 A. No, sir.

8 Q. You left -- or someone left your business card,
9 I'm sure you have seen this, in the Coffee County
10 elections office, right?

11 A. Yes, sir.

12 Q. And was that probably you?

13 A. It was probably me. I don't remember doing that,
14 but it was probably me.

15 Q. And it was found there by the next elections
16 director, Mr. Barnes.

17 Did you get -- when is the first time that any
18 law enforcement from the State of Georgia, or the
19 Secretary of State, or the State Election Board
20 contacted you, if ever, about Coffee County?

21 A. Somewhere in the last two months someone left a
22 voicemail on an old phone number I had.

23 Q. And who was that?

24 A. Someone with the Georgia Bureau of Investigation.

25 Q. Is that the only contact you have had with any of

1 those groups?

2 A. Correct.

3 Q. So the Secretary of State and the State
4 defendants have taken the position that they were
5 actively investigating this starting in April of 2022.

6 Are you with me?

7 A. Uh-huh.

8 Q. And although they were actively investigating
9 this, I take it they didn't contact you until, what,
10 about a month ago?

11 A. Not that I'm aware of.

12 Q. Did you speak with the GBI, or did he just leave
13 you a message?

14 A. He left me a message.

15 Q. Have you been contacted by the January 6th
16 Committee?

17 A. No, sir.

18 Q. The FBI?

19 A. No, sir.

20 Q. The Fulton County Attorney?

21 A. No, sir.

22 Q. So we're the only ones that have contacted you,
23 right?

24 A. So far. I mean, the sky is the limit now that
25 we've had this deposition, right?

1 Q. You've answered all of the questions, you know.
2 No need for your testimony anymore.

3 A. I wish it worked that way, but we'll see.

4 Q. It might.

5 So I take it, just to follow up on the Dominion
6 question, there haven't been any threats of any
7 litigation against you, right?

8 A. No, sir. It's my understanding, if there was any
9 threats, that they should be directed at the attorneys
10 that, you know, brought me on to do work and not at me
11 personally. I have not distributed anything. I have
12 not given anything outside of any access. I haven't
13 made defamation statements about Dominion publicly.

14 Q. And you're not aware of any -- any litigation or
15 any litigation threats against your attorneys or the
16 people that you worked with either, right?

17 A. No, sir.

18 I mean, that's a very, very vague sentence. I
19 mean, obviously Sidney is fighting the defamation battle
20 with -- with Dominion. And, obviously, I said I worked
21 with her some in this stuff too. So, like, that's
22 probably too vague for me to answer blanketly. But not
23 tied with anything that I -- that I have been involved
24 in.

25 Q. That's -- that was the intent of my question.

1 With respect to any work that you did, you're not
2 aware of any of your colleagues being subject to any
3 litigation, correct?

4 A. Correct.

5 Q. Okay. Did -- did you know that Misty Hampton was
6 terminated about a month after you were there?

7 A. I was told that at some point.

8 Q. And did you talk with her about that?

9 A. No, sir.

10 Q. Did you know that on the same day that she was
11 terminated, or the day before, or the day after, Mike
12 Lindell, also known as the MyPillow guy, flew into
13 Douglas, Georgia? Did you know that?

14 A. I would expect that's unrelated. But, no, I
15 didn't know that.

16 Q. And do you know Mr. Lindell?

17 A. I do know Mr. Lindell.

18 Q. How do you know him?

19 A. On the -- the -- was it -- so the Arizona
20 injunction case that I did out in -- there was an
21 injunction case out in Arizona to try to prevent the use
22 of voting machines that I did an expert declaration on
23 that you guys cited on. And I know that he closely
24 followed what was going on with that, and I talked with
25 him associated with that work.

1 Q. Have you talked with him associated with anything
2 involving Georgia?

3 A. No.

4 Q. Do you -- do you know why he was in Coffee County
5 in February of 2021?

6 A. I don't know why he was in Coffee County in
7 February 2020 -- whatever -- at any point in time. And
8 furthermore, I would say that a lot of the different
9 Election Integrity groups don't necessarily get along
10 with each other very well, and I'd be very surprised if
11 anyone with Election Integrity also was pulling him in.
12 My guess is that's unrelated, but you do your own
13 research.

14 Q. Well, but the group that he's involved with is
15 not associated with other Election Integrity groups; is
16 that right? Is that the suggestion?

17 A. Correct.

18 Q. Okay. So which would be your camp? I don't mean
19 to make it sound too --

20 A. I'm not really in a camp. I have worked with
21 almost every one. My goal has been to figure out what
22 happened, and anyone who seems to be honestly working
23 towards that, I have worked with them. That's probably
24 one of the unique things, you know, that -- that's --
25 there's not -- there's not a lot of people who have.

1 Q. And so Mr. Lindell would -- what you're saying is
2 that it's unlikely that he would be associated in a
3 positive way with who? Not with you, not with
4 Mr. Lenberg? Who else?

5 A. So as far as I know, he hasn't done work with --
6 with ASOG, and certainly not at the time period which,
7 as you've said, and I've later, you know, discovered,
8 Charles Bundren associated with. I don't believe he
9 does work with Sidney Powell or Defending the Republic,
10 which apparently signed the contract. You know, so I
11 don't see how it is that someone who is not actively
12 working with people would be involved deeply in a
13 project that, for the most part, people who were on
14 said, hey, don't talk about this and wait until there's
15 litigation -- you know, litigation associated with it,
16 when they're not actively working with it. It doesn't
17 make any logical sense.

18 Q. Had you heard that Mr. Lindell was in Douglas in
19 February of 2021?

20 A. Sometime since the criminal case in the last few
21 months someone mentioned it to me as it had come up.
22 But -- so this is not the first time I heard it, but I
23 couldn't even place when it was. Certainly nothing at
24 the time. You know, it was all very recent.

25 Q. Probably out of this litigation, is the best of

1 your recollection?

2 A. Correct.

3 Q. This is a similar to a question that I asked, but
4 not exactly the same.

5 I know that you weren't contacted by the
6 Secretary of State, or the State Election Board, or the
7 GBI until very recently, but do you know when the
8 Secretary of State, Georgia State officials, found out
9 that SullivanStrickler or you had had access to the
10 Coffee County election equipment in January of 2021?

11 A. No infor- --

12 MS. LaROSS: Object to the form.

13 A. -- I don't have -- I'm sorry, what was that?

14 BY MR. BROWN:

15 Q. She's logging an objection. Go ahead and answer.

16 A. I have no knowledge of that whatsoever outside of
17 what I have read in the case.

18 Q. Okay. Do you know Kurt Olsen?

19 A. Yes, sir, I do.

20 Q. How do you know him?

21 A. He was one of the attorneys on the Arizona case.

22 Q. Do you know him in any other capacity?

23 Well, he's Lindell's attorney, right?

24 A. Yeah, he's -- he's done attorney work for a
25 number of different people, not just Lindell. I don't

1 know -- remember exactly when or how I met Kurt. I met
2 him somewhere along the way. I've talked with almost
3 everyone working Election Integrity at some point in
4 time. So sometimes it's hard for me to place exactly
5 when and where.

6 Q. Do you recall what politicians or other people
7 from Georgia, other than Lin Wood, were at the Lin Wood
8 plantation in December of 2020?

9 A. I don't recall any politicians ever going to his
10 plantation.

11 Q. Do you know Cathy Latham?

12 A. I am familiar with the name from this -- from
13 this litigation, but I do not believe I've talked with
14 her prior.

15 Q. Okay.

16 A. I haven't talked with her, period. I haven't
17 even talked with her as part of this, but I don't think
18 I knew about her prior. Now, if she was involved in
19 Election Integrity, there's a chance I talked with her
20 over the course of time, but nothing -- nothing, you
21 know, that I know about, certainly nothing extensive.

22 Q. I'm almost positive I have asked you this, but
23 Eric Cheney, you don't recall knowing him either?

24 A. Yes. Same thing. Yeah.

25 Q. What about Alex Kaufman, do you know him? Or

1 have you ever talked to him?

2 A. I don't -- Alex Kaufman, I don't think so.

3 Q. Kurt Hilbert?

4 A. I don't think so.

5 Q. Robert Sinners, do you know him?

6 A. I have read -- I think part of this case is where
7 I know that name. But otherwise, no, I don't think so.

8 Q. And I believe you testified that you do know
9 Stephanie Lambert and you both were involved in the
10 Michigan case together, correct?

11 A. Correct.

12 Q. And did you work with her in any way relating to
13 Georgia?

14 A. I don't think anything I have done -- I think
15 since she took over Misty more recently, she might have
16 asked me to take a look at Coffee County stuff again,
17 but I haven't done so. So I think that would apply. I
18 have done a lot of expert work for her, answering
19 questions and so forth over time.

20 Q. Okay. Has she engaged -- are you -- are you
21 currently under engagement with her or anything?

22 A. I -- she continues to ask me questions at times.
23 I am working -- I have been working pro bono and have
24 not been paid for that work. And so I would say
25 potentially yes, but since I don't have a written

1 contract, it's not quite as clean-cut.

2 Q. Is it -- does it relate to Georgia in any way?

3 A. There's nothing specifically I have talked with
4 her recently, specifically or as it relates to Georgia.

5 Q. I have to ask -- the way you answered that, I
6 need to ask: Generally relates to Georgia?

7 A. Stephanie is constantly talking about doing
8 lawsuits, almost anywhere in the country. It is
9 possible that she has mentioned something about doing
10 something in Georgia. I do not know of any active plans
11 to do stuff. I don't want to misspeak, but I don't
12 know -- I don't really know how to answer your question
13 precisely.

14 Q. Fair enough.

15 And I asked you a question about Roger Stone, but
16 I didn't ask generally whether you know him or have
17 worked with him.

18 A. I -- I don't believe I ever talked with him.
19 Wouldn't that preclude working with him?

20 Q. It could. But you haven't worked with him,
21 either, correct, silently?

22 A. Correct. Oh, you're talking about literally, if
23 I had a -- we never speak, we only text. No, I am not
24 using playing with words.

25 Q. I'm looking for that employee that can work that

1 way.

2 How about Ron Watkins, do you know Ron Watkins?

3 A. I do know who Ron Watkins is. And I -- I have
4 not talked with him in a long time, but I did talk with
5 him while I was at the Tomotley.

6 Q. And what -- what -- who is he?

7 A. He is -- I would say he is just a social media
8 guy who has a large following that has been interested
9 in Election Integrity stuff and has a pretty active
10 group base. I mean, I would reach out to him at times
11 and say, hey, can you see if anyone can find me
12 publicly, you know, Dominion manuals on XYZ, and, you
13 know, he would send them to me and stuff like that, you
14 know, because he just had a lot of people, or he put out
15 a request for it, and people followed it, some would do
16 their own research and find data.

17 Q. Have you ever -- do you know Bill Ligon,
18 L-I-G-O-N?

19 A. I don't think so.

20 Q. Do you know Preston Haliburton, lawyer?

21 A. No.

22 Q. Lawyer Harry McDougall?

23 A. That name -- doesn't he work with Sidney?

24 Q. He might.

25 A. I -- I think so. I think I do know him.

1 Q. And do you recall the context for working with
2 him or communicating with him?

3 A. I think he had questions about voting machines,
4 and I sat down and talked with him for a while, as I
5 recall.

6 Q. And you sat down with him in person?

7 A. Correct.

8 Q. There was a lawsuit filed in Georgia in December
9 by a gentleman named Shawn Still, and it was against
10 Coffee County. And it related to the errors, or
11 apparent errors, in Coffee County's system. Were you
12 familiar with that litigation?

13 A. That name sounds familiar. But, no, I don't
14 think I knew anything about it.

15 Q. It was dismissed on January 7th of 2021. Do you
16 recall hearing anything about the lawsuit against Coffee
17 County being filed --

18 A. Okay. So, wait. Let me place it. So you're
19 saying, so before forensic images, after the 2020
20 election, there was a lawsuit filed in Georgia. Because
21 I was at Tomotley, I probably did know about that
22 lawsuit because we were, you know, tracking stuff like
23 that. So I probably did. But obviously nothing
24 specific enough that I -- wouldn't know enough to
25 even -- sorry, what was your question now?

1 Q. Well, I just -- if you knew about that litigation
2 is what I was asking.

3 A. I -- I probably did. I don't remember any
4 specifics.

5 Q. So Tomotley, the group was sort of tracking all
6 the different ways to collect information, see if it was
7 possible to -- depending on your point of view --
8 overturn or correct the election, correct?

9 A. I wouldn't use either of those terms.

10 Q. What term --

11 A. My goal always was to figure out what happened.

12 Q. But that was the goal of the group, then, right?

13 A. I -- I think so, based on the conversations I had
14 with people. I believe that was always the goal, is
15 just to figure out what happened.

16 Q. And specifically the group was tracking all
17 litigation in the country that related to the election,
18 correct?

19 A. The majority of the people at Tomotley were doing
20 was helping -- helping work with grassroots individuals
21 in order to, you know, try to get information and vet
22 information, and connect people that were working on it,
23 you know, to see if we can get to the bottom of exactly
24 what happened.

25 Now, the attorneys, as part of that, any attorney

1 that is involved in litigation, tracks other litigation
2 involved in the same topic. It's what you do. And so,
3 you know, at times they would tell us, hey, there's this
4 case or that case. So the probability is high that we
5 were informed about that. I don't specifically remember
6 that. If it was late in December, it might not have --
7 you know, maybe I might not have known about it. I
8 just -- I don't know.

9 Q. It was actually filed, I think, like, mid
10 December, and the -- the lead plaintiff was what some
11 people call a fake elector.

12 A. So it's possible I wouldn't have known about it
13 at that point. By late December, most people had left
14 Tomotley. Things were dying down. People were getting
15 back to, you know, other stuff, so...

16 I don't know, I guess we're in heavy speculation
17 here --

18 Q. I understand. If you don't know something,
19 that's fine.

20 A. I need to just say I don't know and stop
21 speculating. Theoretically that's not something I'm
22 supposed to do in a deposition.

23 Q. Okay. That's fine with me.

24 MR. BROWN: Let's do this. Let's take a break
25 until 2:45. I'm going to have my wind-up questions,

1 and then after that there will be other counsel that
2 may have questions for you. I'm not the only one
3 asking you questions, although I'm probably asking
4 you most of the questions.

5 THE WITNESS: I hope so.

6 MR. BROWN: So let's take a break until 2:45.
7 I'm giving 20 minutes so I can really coordinate with
8 the other people as to what -- what more we need to
9 ask you about. Thank you, though, for your patience.

10 THE WITNESS: Okay.

11 THE VIDEOGRAPHER: Okay. Thank you. Off the
12 record at 2:25 p.m.

13 (Whereupon, a break was taken from 2:25 p.m. to
14 2:48 p.m.)

15 THE VIDEOGRAPHER: This begins Media Unit
16 Number 4, and we're back on the record at 2:48 p.m.

17 BY MR. BROWN:

18 Q. Mr. Logan, in your Signal text, you referenced
19 Wickr, W-I-C-K-R. What is Wickr?

20 A. It's another communications platform, like
21 Signal, and primarily, it was used at that time because
22 it allowed screen sharing and video, which at that point
23 in time, Signal did not.

24 Q. And were those messages searched for documents
25 responsive to the subpoena?

1 A. I do not have -- even have my credentials for the
2 Wickr account I used at the time. Just didn't maintain
3 them. So, no, those were not searched. But I don't
4 have access to them.

5 Q. Could you get your credentials or find them?

6 A. Well, unfortunately, that was also on the email
7 address, so I can't do a password reset because I don't
8 have access to the email.

9 Q. So the password reset is tied to your Lin Wood
10 email?

11 A. Correct. I'm not even sure what the retention is
12 because it's three-tier client. It might auto-delete as
13 well. I'm not very familiar with Wickr as to what its
14 policy is and how that works. There might not be
15 anything there.

16 Q. Fair enough. And it may be beyond our reach.
17 But do you recall the volume of messages that you had on
18 Wickr with Mr. Penrose or with others?

19 A. I don't think it was much. As I recall, mostly
20 used it if you wanted to, you know, share something on
21 your screen, or do a video chat. So, you know, there's
22 not much remnants behind when you're doing video chat
23 anyway, you know.

24 Q. If you -- if you look at the logs showing the
25 downloads from SullivanStrickler, there's a number of

1 people downloading the software, correct?

2 A. That's, yeah, my understanding.

3 Q. And other than the reports that you made up from
4 your onsite work in Coffee County, are you aware of any
5 work that was done or published by anybody who had
6 access to the SullivanStrickler files?

7 A. I am not aware of any.

8 Q. The --

9 A. The only other person I know actually did an
10 analysis, that I know did an analysis, is Ben Cotton.
11 And you've deposed him, so...

12 Q. Okay.

13 MR. BROWN: I'm going to mark as the next
14 exhibit, Tab 18.

15 (Whereupon, Plaintiff Exhibit 9 was marked for
16 identification.)

17 BY MR. BROWN:

18 Q. And that's going to be Exhibit 9.

19 Do you see Exhibit 9 in front of you, sir?

20 A. Not yet. It hasn't shown up.

21 Yeah, I still don't see anything.

22 MR. BROWN: Let me see what's going on here.
23 Hang on.

24 MS. MARKS: Bruce, it's me trying to -- it
25 looks like I've got to rotate it. So let me try to

1 do that and I will put it up. Sorry.

2 MR. BROWN: That's all right.

3 MS. MARKS: If there's another one you can do,
4 it's going to take me a minute to learn how to do
5 this, Bruce.

6 MR. BROWN: Okay. If you would go ahead and do
7 that, and I'll move to the next question.

8 MS. MARKS: Okay. I apologize. This is all
9 new to me.

10 MR. BROWN: That's all right.

11 BY MR. BROWN:

12 Q. Was Greg Freemyer was at Tomotley?

13 A. No, sir.

14 Q. Do you know if his political associations are
15 with those who are concerned about Election Integrity
16 after the November --

17 A. No, sir, as far as I know, SullivanStrickler was
18 always apolitical, they were just doing a job.

19 Q. And you're not aware of any political connections
20 that they had?

21 A. No, sir.

22 Q. Did you -- your Signal messages that you lost,
23 were they also on your phone? I mean, they would have
24 been on your phone, wouldn't they?

25 A. Correct. They were on my phone at one point in

1 time.

2 Q. And could you retrieve them that way, from your
3 phone, if your desktop was unavailable?

4 A. I -- I do not have them.

5 Q. I understand that's the conclusion. But can
6 you -- you can't get them off your phone?

7 A. I can't get them off my phone. No, they're not
8 on my phone.

9 Q. Okay. The -- did you ever hear of Conan Hayes
10 flying into Georgia for election work?

11 A. I -- that's really vague. I mean, I know that he
12 was in when I met with him, when we were at that --
13 whatever that place was that we didn't do stuff. He
14 probably flew in because he -- I don't think he was
15 local to Georgia. But I don't know any other --
16 anything else beyond that. I mean, is that knowing of
17 him flying in?

18 Q. Fair enough.

19 But you -- you went to -- did you go to other
20 counties in Georgia trying to see if you could have
21 access, legitimately, to their election equipment?

22 A. We did not go to counties to try to gain access
23 to systems. We -- we called contacts and explained what
24 we were trying to do and why we were trying to do it
25 from a lawsuit standpoint, and if they had the

1 appropriate authority and were interested, you know,
2 then we would call someone like SullivanStrickler, you
3 know, in order to see to try to arrange something. But
4 we didn't go, like, shop -- show up on someone's door
5 and knock and just say, hey, can we have your voting
6 system?

7 Q. Did you -- how did you get the contact
8 information to -- to call people?

9 A. You know, it's -- a lot of it was this -- the
10 grassroots patriot network. People would -- people
11 would be saying, hey, we talked to this person here, we
12 talked to that person there. And, you know, they would
13 say, I have a contact here, you should talk to them.
14 And that's, you know, how some of those phone calls
15 happened.

16 Q. Do you know if -- do you know how the Coffee
17 County name got into that hopper?

18 A. I have no idea. I was not expecting anything to
19 happen. You know, I was surprised when they called me
20 up and said there had been a capture. You know, I
21 thought all that type of stuff was done.

22 Q. Okay. If we could look at exhibit 9 now, I think
23 it's up.

24 Before I do that. Your contacts in the Georgia
25 counties was by telephone, not -- you didn't actually

1 drive around the countryside looking for --

2 A. Yes, sir.

3 Q. And to the best of your recollection, the only
4 physical visits were that one county that you can't
5 remember and Coffee County, right?

6 A. I -- I know that we talked to more places, but I
7 could not give you any more details if I wanted to.

8 Q. Okay. Okay. Do you recognize Exhibit 9?

9 A. Should I?

10 Q. Well, I believe you produced it and -- or it was
11 in the -- might have been in the drive that you
12 produced.

13 A. Oh, okay.

14 So, I mean, I recognize the tools that are on the
15 screen.

16 Q. And what are those tools?

17 A. So process monitor keeps track of files that
18 are -- that are currently in use and what registries are
19 being used and so forth and so on.

20 And it looks like immunity debugger, interesting.
21 Immunity debugger is used to put break points. You can
22 stop running an application at certain points to figure
23 out what's going on.

24 Q. And did you use a debugger?

25 A. I -- I didn't think I had for Coffee County. So,

1 I mean, obviously if this came from images I provided,
2 then the answer is yes. I thought I had solely done
3 that part in Antrim.

4 Q. Did you -- where -- use the debugger to analyze
5 the code?

6 A. The only thing I ever recall using the debugger
7 for was to try to figure out how they were handling
8 encryption keys on -- on the device. But, again, I did
9 not think that was something that I did in Coffee
10 County.

11 Q. Okay. So you just don't -- you -- you testified
12 earlier about the encryption. But you don't recall
13 whether that was specific to Coffee County or to another
14 examination of Dominion equipment; is that fair to say?

15 A. Well, I -- I know that I have looked in the
16 database -- pretty sure I looked in the database in
17 Coffee County, and it was across the board that things
18 were clear text for clear text. But I don't recall
19 specifically what I was doing, if this was from the
20 stuff I sent over. I mean, I sent you my virtual
21 machine as were, with whatever snapshots that were in
22 them. So, you know, you have a lot of data information.
23 You probably could tell me better what I did than I
24 could tell you right now.

25 Q. Well, the -- well, I will represent to you that

1 one of our experts made a screenshot from your device --
2 your drive, and this is a screenshot from it. Does that
3 make -- does that look right, or can you tell?

4 A. That's definitely plausible.

5 Q. Okay. You testified that you discovered the
6 Dominion software was making a call to external
7 software.

8 Do you recall that?

9 A. Correct.

10 Q. Is this how you would have discovered it?

11 A. I would have used a tool like process monitor to
12 discover that, yes.

13 Q. Okay. But you don't have any specific
14 recollection of doing that?

15 A. Not -- no. I mean -- no. I mean, not
16 specifically for Coffee County.

17 Q. Okay. I want to get back to Tomotley, and I will
18 be brief because we've covered it some.

19 You were there for, you know, over a month. And,
20 I mean, it sounds like you sat around and talked all
21 day. I know that there was work being done, but the --

22 A. You make it sound so easy.

23 Q. I mean, it does. You're on a Georgia plantation.
24 You're talking and planning.

25 But the -- was the goal basically to collect

1 information, if possible, to support potential
2 litigation, right?

3 A. Yeah. The goal was to understand what happened
4 and to support litigation as needed in that -- in that
5 regard. So I mean, that's why we were working with
6 attorneys for.

7 Q. Was there someone who seemed to be in charge?

8 A. Unfortunately, no.

9 Q. Many people in charge, I guess?

10 A. Yeah, something like that. Yes.

11 Q. Therefore nobody in charge?

12 A. A mixture of too many people in charge and nobody
13 in charge, depending on exactly why.

14 Q. And what was the discussion about the -- the
15 legality or boundaries of the legality of capturing
16 images from election offices?

17 A. It's -- you know, most of those discussions I
18 think Jim had directly with the attorneys. But from my
19 understanding of what he told me is that based on
20 lawsuits and filings by the State, the State actually
21 said the counties were responsible for their elections,
22 and therefore they were individuals that had authority
23 over the machines.

24 Q. You're talking about Georgia specifically?

25 A. I believe so, yes.

1 Q. And so in Georgia, at least, the authorization,
2 if it were to be given, would be given at the county
3 level, correct?

4 A. That -- I'm not an attorney. You know, that's --
5 you're kind of asking for a legal opinion here. But
6 that was my understanding of what was relayed to me.

7 Q. In that group -- in those group discussions, were
8 there concerns expressed about copyright infringement?

9 A. I mean, there wasn't really group instruction --
10 I mean, discussions, I mean, that I recall in that
11 regard on it. It was just ask questions of what we were
12 looking for. Copyright stuff, was there individuals
13 concerned specifically about copyright stuff? I don't
14 recall any specific conversations on that or whether
15 that came up.

16 Q. I may have asked this before, but I'm going to
17 ask this real quick to make sure I've covered it.

18 Did you have any -- I'm going to ask you -- I'm
19 going to list -- give you a bunch of names and the
20 question is: Did you ever meet in Georgia with any of
21 these people, okay?

22 A. Like meet in person?

23 Q. Meet in person, right.

24 A. Okay. That should be easier questions.

25 Q. Okay. Robert Sinners?

1 A. No.

2 Q. Cathy Latham?

3 A. No.

4 Q. Todd Sanders?

5 A. Yes.

6 Q. He -- he was with you in the one -- the first
7 trip to Georgia, right?

8 A. Yeah.

9 Q. Any --

10 A. I don't -- I don't recall any other time -- I
11 don't think there's any other time.

12 Q. Greg Freemyer?

13 A. Did I ever meet him in person? I don't think I
14 ever met Greg in person.

15 Q. Jim -- well, Jim Penrose we have talked about.

16 A. Oh, yeah, all the time. All the time.

17 Q. Did you meet with Jovan Pulitzer?

18 A. Nope.

19 Q. And then Conan Hayes would have been in that
20 first trip as well, correct?

21 A. Correct. And I can't think of another time
22 besides that.

23 Q. What about Joshua Merritt, do you know Joshua
24 Merritt or did you meet with him in Georgia?

25 A. Oh, Joshua Merritt, he -- he does work with ASOG,

1 right?

2 Q. Exactly.

3 A. Okay. I -- no. I didn't meet him there. I have
4 met him before.

5 Q. Okay. And then Russ Ramsland, did you meet with
6 him in Georgia?

7 A. I don't think he ever showed up anywhere, no.

8 Q. Did you ever meet with any members of the Georgia
9 General Assembly in association with your work in
10 Georgia?

11 A. We're talking in person?

12 Q. Yes.

13 A. No.

14 Q. Did you talk with them on the telephone?

15 A. I believe there was some, I couldn't even tell
16 you who. I believe there was one or two that we did.

17 Q. When would that have been?

18 A. I couldn't place it.

19 Q. When you were up in Tomotley, probably?

20 A. Most likely, yeah.

21 Q. But you don't remember who it was?

22 A. No.

23 Q. Probably Republican?

24 A. Most likely, yeah.

25 Q. Just one second.

1 A. When we were talking to them, I'm not sure if
2 they wanted to talk to us. It depends on what was going
3 on, so...

4 MR. BROWN: I'm going to mark -- I'm going to
5 mark the exhibit that has Mr. Skoglund's declaration,
6 which is Tab 6.

7 (Whereupon, Plaintiff Exhibit 10 was marked for
8 identification.)

9 A. So I should be looking for Exhibit 10, Tab 6.

10 BY MR. BROWN:

11 Q. That's correct. It will come up shortly.

12 A. It takes a little longer to check now because I
13 have to scroll.

14 Q. Has it come up yet?

15 A. No.

16 Yeah, still nothing.

17 MR. BROWN: Yeah. Hang on a second. Sorry.

18 MS. MARKS: Bruce, I'm sorry, I was away. What
19 tab do you need?

20 MR. BROWN: Tab 6.

21 MS. MARKS: Okay.

22 BY MR. BROWN:

23 Q. While we're doing that, just to reorient, I had
24 asked you about the -- the cast vote records in JSON
25 format that appeared on the internet.

1 A. Yeah.

2 Q. One of our experts is a gentleman by the name of
3 Kevin Skoglund, and he has given a declaration in this
4 case. And I just want to see if that's consistent
5 with -- with what you understand. And that's going to
6 be the next exhibit. And that's going to be the -- the
7 last -- the last of my questions, at least.

8 MS. MARKS: Bruce, I think it's up. Tell me if
9 it's not.

10 BY MR. BROWN:

11 Q. Do you see it, Mr. Logan?

12 A. Yeah, I'm sorry. I'm looking at it. I'm reading
13 through it.

14 Q. Okay.

15 A. So just generally, he's saying that the cast vote
16 record is in the public domain and accurate and
17 therefore it should be allowed to be used for something;
18 is that the idea?

19 Q. No. It's simply that the prominence of the cast
20 vote records file that appeared on the internet appears
21 to be from Coffee County's EMS, correct?

22 A. Yeah. I -- without seeing it, I don't -- I can't
23 make any attestation whether is or isn't. The best way
24 to do that is it's a ZIP file and there's a hash
25 associated with it. So if you download it and generate

1 a hash and it matches the hash of the file that I
2 generated, you know it's the same thing and you can
3 prove it. If it doesn't, then someone might have
4 tampered with it. It's hard to say.

5 Q. I'm not -- I'm not suggesting any tampering, but
6 when you -- you could have created the JSON -- you could
7 have done all of this in January 17, 2021. I'm not
8 suggesting there's anything wrong about it. But this is
9 something that you could have done based upon your
10 access to the system that SullivanStrickler uploaded to
11 the internet, right?

12 A. Anyone who had access to -- to the data that
13 SullivanStrickler uploaded or had access to the EMS
14 server itself could generate a CVR, yes.

15 Q. Okay.

16 MR. BROWN: Those are all my questions,
17 Mr. Logan. Thank you very much. I will follow up
18 with you offline, we don't need to take it on the
19 record, about whether there are existing sources of
20 documents or -- documents that you might have access
21 to, and we can talk about that offline and figure
22 that out, if necessary. But I appreciate your time
23 today.

24 THE WITNESS: Thank you.

25 MR. BROWN: And with that, if there's -- I

1 think we have -- Mr. Jihadi is going to go next.

2 Thank you very much.

3 CROSS-EXAMINATION

4 BY MR. JIHADI:

5 Q. Hello, Mr. Logan. I'm Wail. First of all, thank
6 you so much for sitting with us today. I can understand
7 how this can be gruelling.

8 To begin with, I just want to clarify on certain
9 testimony that you provided earlier. So I'm just going
10 to ask a couple follow-up questions and for
11 clarification based on what Mr. Brown has already asked.

12 First, earlier you were discussing how you were
13 using -- you were essentially working pro bono on some
14 of these matters earlier on. Were you using your own
15 personal devices or were you using devices from Cyber
16 Ninjas at the time?

17 A. That's an interesting question. I was using my
18 laptop, which was also a laptop that I used with Cyber
19 Ninjas at the time.

20 Q. Okay. And did you -- is this the laptop that you
21 searched to see if anything was responsive to the
22 document subpoena?

23 A. I searched more than just that system. But, yes.

24 Q. Okay. And in terms of -- I also have a question:
25 Do you know what pulse means or what it means to be

1 pulsed? Does that have any meaning to you?

2 A. Not -- not really. Do you have more context?

3 Q. We could go to -- can you pull up Exhibit 4
4 again. We spoke about it earlier.

5 Go to Exhibit 4, go to Line 109, and that should
6 be -- do you have that in front of you?

7 A. Yeah, I'm trying to get to Line 109.

8 I assume he just means he pinged her.

9 Q. Okay. So --

10 A. I don't know why -- I have never heard someone
11 use pulsed.

12 Q. Okay. Because there are a lot of different
13 communications tools that have been used, so I just
14 wanted to clarify that wasn't another communication
15 tool.

16 A. If it is, I don't know about it.

17 Q. Okay. Perfect.

18 And who -- earlier on you were mentioning that --
19 a friend or a contact was the one that connected you
20 with Lin Wood when it came to the data collection and
21 the Election Integrity issues.

22 Did you -- who was this friend, and can you
23 elaborate on what the communications were?

24 A. I just had a friend who was tracking things, and
25 she connected me with someone who connected me with Jim

1 Penrose that went to, you know -- that is how I ended up
2 at Lin Wood's house.

3 Q. Okay. And how was your friend connected in
4 this -- in this entire environment?

5 A. She wasn't connected. She didn't even know the
6 person. She connected me with someone who connected
7 with someone else.

8 Q. Okay. And are you comfortable sharing who the
9 friend is?

10 A. I'm not. Everyone gets docked and attacked and
11 all this stuff, and I don't believe it has any relevance
12 to the case. You know, I'd even say object on
13 relevance, so...

14 Q. Okay. And then earlier we were also discussing
15 possible Georgia election officials that you could have
16 had contact with.

17 Who were all of the Georgia election officials
18 that you had been in contact with, leading up to the
19 efforts in Coffee County, or since then?

20 A. I have absolutely no idea. I couldn't name --
21 I'm not even positive I talked to them. I just feel
22 like there's this vague remembrance that I could have.

23 Q. Okay. But nobody that you could actually name at
24 this moment?

25 A. No. I mean, there was a few elected officials

1 that came out to the audit, that I'm sure if you said
2 their names I'd recognize them, but I couldn't even tell
3 you why I recognize them if you gave them to me.

4 Q. Okay. And also we were talking about certain
5 people that you could have come in contact with in
6 Georgia. I don't know if you answered this, but did you
7 come in contact with Robert Sinners?

8 A. Been asked that, like, three times. So already
9 asked and answered. But, no.

10 Q. You were not. Okay. Perfect.

11 And moving forward, so you also mentioned the
12 potential for certain data, possibly either being
13 legally admissible or not. Who were -- who was giving
14 this legal guidance at this time?

15 A. I heard it through Jim. You would have to ask
16 him. I'm not sure which of the attorneys he got that
17 from.

18 Q. Who, Jim Penrose?

19 A. Correct.

20 Q. Okay. And earlier we also talked about Garland,
21 Favorito, I believe. Did Garland know about the Coffee
22 County capture?

23 A. I don't think so. I don't know how he would
24 have.

25 Q. Okay. And we also were talking about ASOG. So

1 who was the attorney for ASOG?

2 A. I -- I have been told that Charles Bundren is an
3 attorney for ASOG. I have no idea if that's their only
4 attorney or not.

5 Q. Okay.

6 A. And I have been told that after -- you know,
7 after. I didn't know that at the Coffee County time.
8 At least I don't believe I did.

9 Q. Okay. And what was -- I'm sorry if you did
10 answer this earlier, but just for clarification: What
11 was Bundren's relationship to the Coffee County data
12 collection?

13 A. I -- I don't recall. I don't know if I ever knew
14 and don't remember or what.

15 Q. Do you know who would know?

16 A. Possibly Jim.

17 Q. Okay. And earlier -- if you can please open up
18 Exhibit 8. It's one that we have already introduced
19 earlier.

20 A. Tab 11?

21 Q. It is Tab 11. And then on the bottom right you
22 should see the numbers that end -- go down to the one
23 that ends from 39, go to 39 to 40, please.

24 A. 37, 38, 39. Okay.

25 Q. Okay. And do you see the email from Jim Penrose

1 at the bottom of the page? It -- at 39, it just begins
2 with Paul, and then the rest is on 40.

3 A. Yeah.

4 Q. Okay. Do you see how in the last two sentences,
5 do you see that, the one that says --

6 A. Yes, sir.

7 Q. -- "Please do not communicate about any
8 additional forensics work in Arizona to the other legal
9 teams. Keep that in confidential channels with me,
10 Sidney, and Doug only."

11 What confidential channels were you, Sidney, and
12 Jim Penrose utilizing at this time?

13 A. I think it was just Signal. Possibly Wickr? I
14 don't know.

15 Q. Okay. And these you searched for, any of these
16 communications when you were going through your Signal
17 communications, right?

18 A. Yeah. I searched through all of the Signal
19 communications I had. I did not -- as stated earlier, I
20 did not search through Wickr because I do not have
21 access to that account.

22 Q. Okay. But based on your searches on Signal,
23 you used some of the search terms that you decided on,
24 but you didn't end up filtering that afterwards based on
25 what you perceived to be relevant or not, right?

1 A. I mean, when the word came up coffee, and they're
2 talking about the coffee to drink that night, yes, that
3 was filtered out. But, no, if they were talking about
4 Coffee County, I didn't filter it out.

5 Q. What about efforts that were just generally in
6 Georgia, did you search up Georgia as well?

7 A. I do believe I did.

8 Q. Okay. And can you make sure that you also
9 searched Georgia after this, if possible?

10 A. I can go back, but I can also tell you that, as
11 mentioned, I have my Signal messages back to
12 January 10th.

13 Q. Okay.

14 A. And I didn't do anything in Georgia, besides
15 Coffee County, after January 10th. So there won't be
16 anything. I mean, I searched it before and I can search
17 it again. But I didn't do any work in Georgia, besides
18 Coffee County, past January 10th, so...

19 Q. Okay. And we can follow up on that.

20 Earlier, also I do want to ask you about the
21 virtual machines. So sorry if I require clarification.
22 Clearly I don't have as much experience in this as you.

23 But you were mentioning the virtual machines. So
24 what does the virtual machine actually allow a user to
25 do when it comes to, like, studying the voting system?

1 Could you please clarify that?

2 A. So you can actually run the voting system, so
3 that just makes it much easier to see how it works and
4 operates if you can actually run the voting system,
5 so -- and I should say, that isn't the entirely true,
6 because you can really just run the individual
7 components, and the voting systems require complex
8 hardware.

9 So like the ballot marking devices, you know, as
10 an example, without a physical working copy of that,
11 that would be very difficult to do anything with. You
12 know, similar sorts of thing with the ICC, you need
13 the -- you would need the actual scanners with it in
14 order to use it in that manner.

15 Q. Okay.

16 A. But the EMS server, you know, the standard
17 reporting and everything you can run and you can utilize
18 that. The EMS server primarily is what is the -- the
19 easiest to -- to use somewhat in a live environment.

20 Q. Okay. And then that's how -- is that how someone
21 would use it to, like, run a test on the virtual system
22 or, like, could you provide an example of how someone
23 would actually use it to run a test on it?

24 A. Sure. You know, so if you wanted to see exactly
25 how it functioned and if there were -- there was

1 vulnerabilities in it. I mean, you had the advantage,
2 you can actually snapshot it at a certain state, and you
3 can try different things. And if you discover anything
4 in it, or you accidentally correct the data, you can
5 revert back to the snapshot, you know. Whatever you
6 need to do in order to work with it to get an idea of
7 how it functions and what it's doing. Did they follow
8 security best practices; did they not? You know, as the
9 report I issued out of Michigan, Antrim, Michigan
10 showed.

11 Q. Okay. And you -- and you worked on a report.
12 Are you aware of other reports that -- like, similar
13 findings have resulted in them being produced, or just
14 conducted?

15 A. So I -- I did a report in Antrim, Michigan.
16 There was a lot of work done in Antrim, Michigan. If
17 you go to Matt DePerno's website, you can download all
18 the experts. There's probably 30 expert reports on
19 various things that were done associated with them.
20 Wake, TSI did something out of Fulton County
21 Pennsylvania, not Georgia, like someone's affidavit was
22 improperly -- you know, attested to in your case.

23 There was -- you know, there's the Mesa County
24 stuff that various different people have done reports
25 off of. There's the Maricopa audit report that had

1 specifically election related findings in it.

2 That's all that comes to mind right now that I
3 know of that -- there's all the DEFCON reports that
4 include software, some of the stuff that is included is
5 very similar to what is being used in Georgia.
6 Specifically Dominion ICP devices, versions of those
7 were tested and exploited as part of the DEFCON voting
8 village.

9 Q. Okay. And so on the same subject of the virtual
10 machines, who else worked with the uploaded virtual
11 machines in the SullivanStrickler ShareFiles?

12 A. I don't recall that. But based on my messages,
13 Jeff was asking for a copy of them, so he obviously did
14 at some point in time. Conan was asking about that, so
15 he obviously worked them at some point in time. Anybody
16 else would just be speculation for me to even mention
17 it.

18 Q. Okay. And we don't want you to speculate right
19 now.

20 Also, when it comes to -- we discussed Mike
21 Lindell earlier. Have you ever flew with Mike Lindell
22 or been on his plane? Because there has been some
23 activity with Mike Lindell's plane.

24 A. I have never been on Mike Lindell's plane.

25 Q. Okay. So never been to Douglas County -- or

1 Douglas, Georgia, on his plane, nothing?

2 A. No.

3 Q. Okay.

4 A. Every time I went to Coffee County, which was
5 once, I drove there. It would have been much nicer to
6 fly on an airplane. I would love to do that.

7 Q. Sure.

8 And then earlier you also mentioned that the GBI
9 has recently contacted you and left you a voicemail,
10 correct?

11 A. (No audible response.)

12 Q. Which phone number did they use?

13 A. The -- the 941 number that -- I mean, it ends in
14 360. How do you want me the specify it? Like --

15 Q. Well, was it, like, the same phone number that
16 was on the business card, the --

17 A. Yes. Yeah.

18 Q. -- what phone number is that?

19 A. Yes.

20 MR. JIHADI: Okay. And right now we're going
21 to take a 10-minute break -- or we'll do a 10-minute
22 break real quick, see if there are any last minute
23 questions, and then we should be done afterwards, at
24 least on my side.

25 THE WITNESS: Okay.

1 THE VIDEOGRAPHER: Off the record at 3:24 p.m.
2 (Whereupon, a break was taken from 3:24 p.m. to
3 3:30 p.m.)

4 THE VIDEOGRAPHER: Back on the record at
5 3:30 p.m.

6 MR. JIHADI: Okay. Thank you so much,
7 Mr. Logan. That is all the questions I have right
8 now. And we will turn it over to anybody else that
9 has questions. Thank you.

10 CROSS-EXAMINATION

11 BY MS. LaROSS:

12 Q. Mr. Logan, my name is Diane LaRoss, and I guess
13 I'll go next.

14 A. Sounds good.

15 Q. We appreciate your time today. Thank you. And I
16 thought I'd better turn my video on so you could see a
17 face to the voice.

18 As you know, I represent the State defendants. I
19 have chimed in a couple of times during your -- the
20 deposition thus far today.

21 So I have a couple of questions for you. You
22 mentioned that when you were in Coffee County, in
23 January, I believe it was on January 18th and 19th, and
24 you were in the Coffee County election office, you had
25 testified earlier about the clock being changed on the

1 election equipment.

2 Do you recall that testimony earlier?

3 A. Yes, ma'am.

4 Q. Okay. And you also testified, I believe, that
5 you never physically touched the election equipment in
6 Coffee County, correct?

7 A. Yes, ma'am.

8 Q. And did you instruct Misty Hampton how to change
9 the clock on that occasion?

10 A. I don't recall. I don't believe so. But it's
11 possible. I really don't know.

12 Q. And do you know -- well, do you recall if she
13 knew how to do it herself, or if you -- or did someone
14 else instruct her to do it --

15 A. I'd be really surprised if she didn't know how
16 to. She's very computer proficient. But I really don't
17 remember.

18 Q. So did Mr. Lenberg instruct her on changing the
19 clock, as you recall?

20 A. I -- I don't recall any instruction with changing
21 the clock, you know, on how to do it or whatever. I
22 really am not sure.

23 Q. Okay. And the clock was changed. Was it changed
24 in Windows, or in the files, or what part of the
25 computer system was the clock changed?

1 A. I don't remember the specifics. But if I was
2 going to do it today, in order to try to mimic what
3 happened with the election, you know, on the EMS server,
4 you would have to change it on the Windows machine, and
5 on a device like the ICP device, you would have to
6 change it on that device in order to have it all match
7 up. So it would be by my assumption that's what happened.

8 Q. Are you aware of any other equipment in Coffee
9 County other than what you've mentioned on which the
10 clock may have been changed?

11 A. The ImageCast Central, the ICC machine,
12 potentially. But those were the only three machines
13 that were used for that, so...

14 Q. And you said that you thought if the clock had
15 been changed, that the change would be back to election
16 day? Do I have that -- your testimony correct? And
17 tell me if am wrong.

18 A. That would be my understanding, yes. You know, back
19 to a time when ballots were being processed. Because
20 if -- you know, if you wanted to reproduce an anomaly,
21 if you had some malicious code that was triggered based
22 on a date, you'd want the date to coincide with
23 wherever, you know, that would happen. So, yes, it
24 would be on election day or a day it was -- where
25 ballots were being processed.

1 They said it was actually a couple of days
2 afterwards. I don't know why exactly that would be.
3 But it's possible that the ballots were still being
4 processed on that day, and then if that was the day the
5 anomaly was detected, then that might have been a date
6 that would have been set up next.

7 Q. So would it have been counting ballots in
8 January 2021, or would it be to go back in time to the
9 November 2020 election?

10 A. The dates on all the systems would have been set
11 back to -- to whatever date it was from the stuff. I
12 don't remember. I'm sorry. I can't tell you
13 specifically. Jeff might be able to tell you more. I
14 understand he has a deposition on Monday.

15 Q. Do you recall the clock being reset after the
16 work was done on the machine, or the --

17 A. I don't specifically recall it being set or
18 specifically recall it being reset. I would imagine it
19 would have been, but I really -- I'm sorry, that was
20 almost two years ago.

21 Q. Sure. And we understand that.

22 And so you've mentioned the ballots, malicious
23 code, in your explanation here today. Did you find any
24 malicious code in the Coffee County equipment?

25 A. No, ma'am.

1 Q. Did you insert any malicious code in the Coffee
2 County equipment?

3 A. Definitely not.

4 Q. We need to have a clear record. So that's the --

5 A. I suppose that would be a bad one to take the
6 Fifth, right?

7 Yeah, no. Definitely. I have never written
8 malicious code for any election equipment. I have never
9 written really I'd say malicious code. I guess proof of
10 concepts I have done in penetration testing possibly,
11 but nothing associated with any election equipment,
12 ever, nor I wouldn't do so.

13 Q. Then going back to the Coffee County equipment,
14 are you -- so I need to ask all the questions. So are
15 you anywhere of anyone else who looked at the Coffee
16 County equipment in January 2021 and found malicious
17 code?

18 A. No, ma'am.

19 Q. And I -- I guess I need to ask this other
20 question too: But are you aware of any individuals who
21 inserted malicious code in any of the Coffee County
22 equipment?

23 A. No, ma'am. And if I -- if I was aware of that, I
24 would report it to law enforcement.

25 Q. I'm going to ask you a couple of questions about

1 your preparation for your deposition today.

2 What all did you do to prepare for your testimony
3 today?

4 A. I took out my Federal Rules of Civil Procedures
5 that I've had to become familiar with lately, and I had
6 some lovely light reading there. I did some Google
7 searches associated with questions and objections
8 associated with depositions to get a better idea on
9 things. And that was the majority of my preparation.

10 Q. So did you review any documents related to the
11 Coffee County incident that we've talked about today?

12 A. Over the course of producing documents that I
13 turned over, I reviewed things during that. But, no, I
14 did not specifically go and read through documents to
15 prepare for the deposition today.

16 Q. And you mentioned that I believe in talking about
17 Exhibit 6, that -- and I think that that was the
18 SullivanStrickler log file, that you had pulled that
19 from the case file.

20 Do you recall that testimony?

21 A. Yeah. I -- I do believe that's where I got it.
22 But there's a number of people that are -- that are
23 sending me stuff associated with this case, and I am not
24 positive that specific file is something someone sent me
25 or whether that was something that I went and pulled

1 myself.

2 Q. And when you say the case file, what are you
3 talking about?

4 A. When you go into PACER and go to the case.

5 Q. So you mean the official court documents that
6 have been generated in relationship to this
7 litigation --

8 A. Correct.

9 Q. -- on PACER; is that --

10 A. Correct.

11 Q. Okay.

12 A. It had all the redactions and everything, if
13 that's what you're asking, so --

14 Q. Okay. Very good.

15 And have you reviewed any deposition transcripts
16 of anyone else who has testified, with respect to the
17 Coffee County incident in this litigation?

18 A. Yes, ma'am. I read through the deposition of Ben
19 Cotton.

20 Q. And how did you obtain a copy of the deposition
21 transcript of Ben Cotton?

22 A. I think Kevin Mancala gave me that one.

23 Q. Was that at your request, or he provided it to
24 you on his own accord?

25 A. I'm not sure.

1 Q. And I understand that you have had contact with
2 Marilyn Marks; is that correct?

3 A. Besides a handful of emails associated with
4 arranging this deposition, no, I have not talked with
5 her.

6 Q. Okay. When did you -- let me ask it this way:
7 So when did you first hear the name Marilyn Marks?

8 A. It was definitely associated with this case. But
9 I believe it was -- yeah, just associated with this
10 case. I don't know the exact time frame, but it would
11 have been in the last three to six months. I don't
12 believe I've ever talked with her. I mean, she's on
13 this call. Maybe I'm remembering wrong. I don't
14 believe I've ever talked with her. Yeah.

15 Q. Just asking for your best memory, Mr. Logan.

16 So when you first learned her name, would that
17 have been before your December 2020 visit to Georgia,
18 let's say?

19 A. No.

20 Q. I know you mentioned it was --

21 A. It definitely -- would have definitely been
22 after. I believe it was the time period when they
23 started subpoenaing people for Coffee County is when I
24 first heard her name.

25 Q. Okay. So would that have been, perhaps, last

1 December?

2 A. It wasn't that long ago. It was sometime this
3 summer, I believe. June, July, something like that.

4 Q. Okay. And so -- and you said you've had a few
5 contacts with her. And was that entirely by email?

6 A. Yeah. It was all associated with this deposition
7 in the last, what, week or two.

8 Q. Okay. But -- and, again, so that was by email, I
9 think you said?

10 A. Correct.

11 Q. Okay. And did you have any -- let me start that
12 over.

13 So have you ever had a telephone conversation
14 with Ms. Marks?

15 A. I don't believe so.

16 Q. How about with Bruce Brown, have you had a
17 telephone conversation -- any conversation by telephone
18 with Bruce Brown?

19 A. Yes, ma'am.

20 Q. And how many times?

21 A. Two or three times.

22 Q. And when were those two or three times that you
23 had phone conversations with Bruce Brown?

24 A. They were all in the last few weeks related with
25 the motion to compel, which I represented myself pro se

1 on. And this deposition -- actually I think it was all
2 the motion to compel stuff.

3 Q. Did you talk with Mr. Brown about your testimony
4 during this deposition?

5 A. No, ma'am.

6 Q. And in the conversations you said that you pretty
7 much mostly spoke about the motion to compel, anything
8 else that you discussed with Bruce Brown on -- sorry --
9 during your telephone conversations with him?

10 A. He had some questions for me related to why I
11 didn't have documents, and some of those had a few other
12 questions with it. I don't remember the specifics
13 exactly on it. But we had -- you know, we had a
14 conversation about those things.

15 Q. Did he provide you any documents before your
16 deposition today?

17 A. There was one email that -- for a short period of
18 time I had an attorney that was helping me that he
19 provided to them for me to take a look at, because I
20 said I didn't have it -- any documents. And I had to
21 explain why I no longer had access to that email account
22 in question.

23 Q. Do you recall what document it was that they
24 sent, that was sent to you by Mr. Brown?

25 A. It was one of the -- the emails that I was, you

1 know, copied -- cc'd on, you know, at my -- at my
2 doug@[REDACTED]. I don't remember the specifics
3 beyond that.

4 Q. And in your discussions with Mr. Brown, was there
5 anything about the Coffee County incident that you have
6 not told us about today?

7 MR. BROWN: I object. That's -- that's too
8 vague to comprehend.

9 And, Diane, I can give you a copy of the email
10 that I sent to the witness with the attached email.
11 And I will also send to you the email that I sent to
12 Bryan Tyson immediately prior to sending that email
13 to Mr. Logan, confirming that -- showing Mr. Logan
14 that confidential document was appropriate. I will
15 do that after this deposition.

16 MS. LAROSS: Okay. Yeah, Bruce, I appreciate
17 that. Thank you very much.

18 BY MS. LaROSS:

19 Q. And so he can object, Mr. Logan, but I'd still I
20 like you to answer the question, there's anything
21 that --

22 A. Nothing comes to mind.

23 Q. Okay. In your testimony earlier, I just wanted
24 to clarify something. I -- my notes may be incorrect.

25 Did you mention that in January of 2021, that

1 Coffee County BMDs had been copied to your knowledge?

2 A. To my knowledge, I thought that they had not been
3 copied. And I actually used that in my response in part
4 of the motion to compel. And in a conversation with --
5 with Mr. Brown, he said, actually, on one of the thumb
6 drives, there is a copy of the BMD application package,
7 and I could look at the copy I had of it and confirm
8 that he was in fact correct and I just didn't realize it
9 was there.

10 Q. Okay. So you discovered that as a result of the
11 conversation with Mr. Brown?

12 A. Yes, ma'am.

13 Q. And that would have been in the last few weeks or
14 was in relation to scheduling this deposition or the
15 motion to compel?

16 A. Yeah. Everything would have been in the last
17 30 days.

18 Q. You also earlier in your testimony talked about a
19 special report. I think you were referring to the
20 Exhibit 3, which was the document that you had prepared
21 concerning your Signal messages. And your discussion
22 earlier with Mr. Brown, you had both referenced a
23 special report.

24 Do you recall that testimony?

25 A. Yes. That is part of the documents I turned over

1 as part of discovery.

2 Q. Okay. So that -- so that was my next question:
3 So that would have been included in the documents that
4 you produced in response to the subpoena in this case to
5 you?

6 A. Correct. Yes, specifically with the motion to
7 compel, I listed that document on attorney work product,
8 but said I wasn't sure if the attorney was going to
9 exert that on it. So the judge ruled to give him ten
10 days to exert privilege on it. He did not. And so that
11 document was provided as part of discovery.

12 Q. You spoke a good bit during your testimony
13 concerning election results in Georgia.

14 Do you think that Trump won the Presidential
15 election, actually won the Presidential election here in
16 Georgia in 2020?

17 A. I don't have a clear opinion as far as it comes
18 to Georgia.

19 Q. Okay. So you don't -- you don't think that Biden
20 actually won or -- you don't have an opinion as to who
21 won?

22 A. Biden was -- is our rightful President. Do I
23 think there was cheating that was involved in this
24 election? Yes, I do.

25 Q. And is it your testimony that that occurred in

1 Georgia?

2 A. I don't have any firsthand knowledge to specify
3 whether that's true or not true in Georgia.

4 Q. Do you think that Georgians can trust the results
5 from the 2020 election as accurate, the results that
6 have been reported by the Secretary of State's office?

7 A. I have reviewed a lot of discrepancies associated
8 with Georgia and the way the audits were done and so
9 forth that I've reviewed at times. And I am skeptical
10 of the reports. First, for a race that was this close,
11 I really don't think I could say whether they should or
12 shouldn't trust in them. I absolutely believe that
13 electronic voting machines lack the transparency
14 necessary for proper elections in place, and
15 specifically the software being used as vulnerable,
16 extremely vulnerable, and should not be in place and
17 could be easily exploited by foreign adversary.

18 So do I have knowledge of something being done
19 with it? No. But do I trust it? Do I trust the
20 results? No.

21 Q. And getting back, I think I asked you about
22 telephone conversations with Mr. Brown. Did you also
23 receive emails or have other communication with him,
24 other than the telephone calls?

25 A. Yes, ma'am. We had emails.

1 Q. And what did the emails pertain to?

2 A. All associated with the motion to compel and this
3 deposition.

4 Q. Okay. Did any of the emails pertain to your
5 testimony that you have given here today?

6 A. As far as what I was going to say?

7 Q. Yes.

8 A. Yeah. So I -- I believe there was nothing from
9 Mr. Brown, but I was originally told that this
10 deposition was going to be in my personal capacity. And
11 I did notify Mr. Brown that if it got into my expertise,
12 that the Thirteenth Amendment does not allow you to just
13 force someone to use their expertise and that I would
14 potentially bill him for the work. And so in that
15 regards, I mean, that's a little bit more beyond, you
16 know, what things are, but he never agreed or even
17 replied to that message.

18 Q. Did you ever speak with Mr. Brown concerning the
19 events about -- that you testified to today that
20 occurred in Coffee County in January 2021?

21 A. Not outside the context of explaining why I did
22 not have the records he was requesting.

23 Q. And I think you said you received emails from
24 Ms. Marks.

25 What did those emails pertain to?

1 A. Primarily, I live pretty rural, and I do not have
2 reliable internet access. It goes out for five, ten
3 minutes at a time. And so primarily my emails with her
4 were in regards to setting up a place at a hotel where I
5 could do this deposition.

6 Q. And at any time, or in any part of those emails,
7 did she discuss the events in Coffee County or the
8 Georgia election system?

9 A. No, ma'am.

10 MS. LaROSS: I think that's it. But let me
11 just check, if you don't mind, I will just take a
12 second here.

13 Okay. Thank you, Mr. Logan. Those are all the
14 questions that I have. Appreciate your time, sir.

15 MR. BROWN: No redirect. Thank you, Mr. Logan.
16 And have a safe trip back home.

17 THE WITNESS: Thanks.

18 MR. BROWN: We can go off the record now.

19 THE VIDEOGRAPHER: Just a moment. This
20 concludes the video recorded deposition, and we're
21 off the record at 3:53 p.m.

22 Thank you.

23 MS. MARKS: And, Jazzmin, I will take a copy of
24 the deposition, the transcript. Thank you.

25

1 (Thereupon, the proceedings concluded at
2 3:54 p.m.)
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CERTIFICATE OF OATH

STATE OF FLORIDA:

COUNTY OF ORANGE:

I, Jazzmin A. Musrati, RPR, CRR, Notary Public, State of Florida, do hereby certify that DOUG LOGAN personally appeared before me via videoconferencing technology on November 18, 2022, and was duly sworn and produced driver's license/I.D. as identification.

Signed on December 2, 2022.



Jazzmin A. Musrati, RPR, CRR

Notary Public - State of Florida

My Commission No. GG984252

My Commission Expires: May 4, 2024

CERTIFICATE OF REPORTER

STATE OF FLORIDA:

COUNTY OF ORANGE:

I, Jazzmin A. Musrati, RPR, CRR, Notary Public, State of Florida, certify that I was authorized to and did stenographically report the deposition of DOUG LOGAN; that a review of the transcript was requested; and that the foregoing transcript, Pages 1 through 229, is a true and accurate record of my stenographic notes.

I further certify that I am not a relative, employee, or attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

DATED: December 2, 2022.



Jazzmin A. Musrati, RPR, CRR
Registered Professional Reporter
Certified Realtime Reporter

1 Doug Logan

2 [REDACTED]

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4 RE: Curling, Donna v. Raffensperger, Brad

5 11/18/2022, Doug Logan (#5591036)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-midatlantic@veritext.com

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,

23 Veritext Legal Solutions
24
25

1 Curling, Donna v. Raffensperger, Brad

2 Doug Logan (#5591036)

3 E R R A T A S H E E T

4 PAGE_____ LINE_____ CHANGE_____

5 _____

6 REASON_____

7 PAGE_____ LINE_____ CHANGE_____

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9 REASON_____

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18 REASON_____

19 PAGE_____ LINE_____ CHANGE_____

20 _____

21 REASON_____

22 _____

23 _____

24 Doug Logan

Date

25

1 Curling, Donna v. Raffensperger, Brad

2 Doug Logan (#5591036)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Doug Logan, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10
11 _____
12 Doug Logan

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16
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18 _____
19 NOTARY PUBLIC
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